

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF TEXAS  
3 DALLAS DIVISION

4 UNITED STATES OF AMERICA, ) 3:21-CR-236-E  
5 GOVERNMENT, )  
6 V. ) DALLAS, TEXAS  
7 WILLIAM ROY STONE, JOSEPH )  
8 DELEON )  
9 DEFENDANTS. ) AUGUST 9, 2023

10  
11  
12  
13  
14  
15 -----  
16 TRANSCRIPT OF  
17 CLOSING ARGUMENTS  
18 VOLUME 11B  
19 BEFORE THE HONORABLE ADA E. BROWN  
20 UNITED STATES DISTRICT JUDGE  
21 -----  
22  
23  
24  
25

A P P E A R A N C E S

FOR THE GOVERNMENT:

Jenna Danelle Rudoff  
US Department of Justice  
1100 Commerce St  
3rd Floor  
Dallas, TX 75242  
214-659-8600  
Fax: 214-659-8500  
Email: Jenna.rudoff@usdoj.gov

Donna S Max  
US Attorney's office for Northern  
District of Texas  
1100 Commerce Street  
Third Floor  
Dallas, TX 75242-1699  
214-659-8664  
Email: Donna.max@usdoj.gov

Marcus J Busch  
US Attorney's Office  
1100 Commerce St  
Suite 300  
Dallas, TX 75242  
214-659-8642  
Fax: 214-659-8809  
Email: Marcus.busch@usdoj.gov

FOR THE DEFENDANT WILLIAM ROY STONE:

Gregg Gallian  
Gallian Firm  
Parkside Tower  
3500 Maple Ave  
Suite 720  
Dallas, TX 75219  
214-432-8860  
Email: Gregg@gallianfirm.com

Jaclyn Annette Gallian  
Bryan Cave Leighton Paisner  
2200 Ross Avenue  
Ste 4200w  
Dallas, TX 75201  
214-721-8058  
Email: Jaclyn.gallian@bc1plaw.com

1 FOR THE DEFENDANT JOSEPH DELEON:

2 Greg Westfall  
3 Westfall Sellers  
4 1612 Summit Avenue  
5 Suite 200  
6 Fort Worth, TX 76102  
7 817-928-4222  
8 Fax: 817-385-6715  
9 Email: Greg@westfallsellers.com  
10

11 Frank Sellers  
12 Westfall Sellers  
13 1612 Summit Avenue  
14 Suite 200  
15 Fort Worth, TX 76102  
16 817-928-4222  
17 Fax: 817-385-6715  
18 Email: Frank@westfallsellers.com  
19  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

<u>C H R O N O L O G I C A L I N D E X</u>	
August 9, 2023	PAGE
Appearances.....	2
Proceedings.....	5
Proceedings adjourned.....	100
Reporter's Certificate.....	101

1 (P R O C E E D I N G S)

2 (Jurors present.)

3 THE COURT: There were three small edits that I  
4 need to make to the draft that I read to you. After closing  
5 arguments I'll have a perfected copy with the corrections made,  
6 but I just wanted to point out very quickly on Page 18, in  
7 Section B, Counts 2 through 7, Wire Fraud, 18 United States  
8 Code Section 1343. The second paragraph under Section B reads  
9 specifically Defendant Willian. It should be William with an  
10 M. Accidentally has an N. So I'll correct that in the copy  
11 that you get to take back and deliberate.

12 The second tiny thing, if you turn to Page 23  
13 of 26, in the fourth paragraph, which begins "The term  
14 specified unlawful activity," there's a typo. The sentence  
15 should correctly read as follows: The term specified unlawful  
16 activity includes in this case that the Defendant Stone  
17 unlawfully defrauded C.T. of money and other property in return  
18 for Stone's purported involvement in C.T.'s fictitious federal  
19 probation. And so the corrected version will be given to you.

20 And finally, the last small typo, which always  
21 happens, on Page 24 under Section D, Count 9, False  
22 Impersonation of a Federal Officer, 18 United States Code  
23 Section 912. In the second paragraph it should read, For you  
24 to find the defendant guilty of this offense alleged in Count 9  
25 rather than Count 8. So the 8 is a typo; it should be 9. And

1 so I will again have a corrected copy ready for you guys when  
2 deliberation time happens.

3 And with that said, Counsel will give you their  
4 closing arguments.

5 Government?

6 MS. RUDOFF: Thank you, Your Honor.

7 THE COURT: You're welcome.

8 MS. RUDOFF: May it please the Court.

9 THE COURT: Please.

10 MS. RUDOFF: Ladies and gentleman of the jury, I  
11 first want to take a moment to thank you. Thank you on behalf  
12 of Marcus, Donna and myself. We appreciate all the attention  
13 that you've given us. All of your focus. All of your  
14 fairness. And truly, and most importantly, your patience.

15 Protect and serve. Those were the first words  
16 out of my mouth when we started this journey together. They  
17 were words that relayed a meaning to Casi Thompson. Words that  
18 had meanings specifically related to the defendants. Because  
19 you -- because what you heard, and what I told you you would  
20 hear, is that for more than a decade that is what the  
21 defendants led Casi Thompson to believe they were there to do  
22 for her.

23 The lies, the manipulation started back in 2005.  
24 You heard that evidence. Those lies and that manipulation  
25 slowly built up over time. Times when Casi Thompson told you

1 that she was at her very lowest. Her family had abandoned her.  
2 Her children were no longer in her custody. She had been  
3 arrested multiple times and she was hopelessly addicted to  
4 meth.

5                   These were times when Casi told you she confided  
6 in Joe DeLeon and sometimes even Stone about these darkest  
7 moments and her deepest vulnerabilities. But what Casi didn't  
8 know at the time, and truthfully she couldn't have known, is  
9 that all those details she shared about her past would  
10 eventually be the very weapons and tools the defendants used to  
11 manipulate her, to terrorize her, to isolate her, to defraud  
12 her from 2015 to 2019.

13                   The evidence has clearly shown in this case the  
14 only people the defendants ever protected were each other. And  
15 the only interest they've ever served were their own.

16                   It wasn't about protect and serve for the  
17 defendants. It's always been about control and exploitation.  
18 And it's those things that brought us here today. And so to  
19 understand those crimes which have been charged, and the  
20 evidence that we've presented to you in support, we have to go  
21 back to 2015.

22                   January 2015. You heard evidence that Casi came  
23 home from rehab. She was clean, healthy, happy. Reunited with  
24 her family. Mending relationships with her children. She was  
25 on the up-and-up.

1 And in February 2015, you heard evidence that  
2 Casi's beloved grandmother, Myrna Thompson, added Casi as the  
3 executor of the estate. This was a big deal to Casi. She told  
4 you about that. It meant that her family had accepted the old  
5 Casi was back. The meth-using Casi was gone.

6 Unfortunately, November 6th, 2015, her  
7 grandmother passed away. With the matriarch of the family no  
8 longer in the picture, it was up to Casi to plan the funeral  
9 and to make sure it went exactly the way her grandmother  
10 wished.

11 Soon after that, you heard evidence that that  
12 very night, the defendants showed up at her house, ready to  
13 talk. And within just a couple weeks, Casi goes and gets the  
14 will of Myrna Thompson probated. The money's now released.  
15 And the evidence showed you two days later, on December 16th,  
16 2015, the plan, the scheme was set in motion.

17 And it was on December 16th, 2015, that Casi  
18 Thompson officially went from a person to a project. Project  
19 Number 2. That's what the evidence showed you. That's how the  
20 defendants referred to her. No consideration for her feelings.  
21 No consideration for the position that she was in. Her fear,  
22 her desperation to stay on the track she was on. She was a  
23 project.

24 A project. Casi still thought the defendants  
25 were there to protect and serve, but it very quickly became



1 very clear the defendants' own purpose was to control and  
2 exploit.

3           You heard evidence and testimony about all the  
4 different manners of control and exploitation. You heard Casi  
5 tell you that she had to get 12 sessions for tattoo removal.  
6 The pain she had to go through because she was put under the  
7 impression that there was a tattoo on her body that needed to  
8 be removed as it related to her probation.

9           You also heard her testify about an experience  
10 where Bill Stone told her, and described in great detail, about  
11 a video in which he viewed and was publicly out and available,  
12 where she was gang raped. Gang raped.

13           And her only concern at that moment was, one, of  
14 embarrassment, because she thought it actually happened to her;  
15 and two, that this video, if it got out, what would happen to  
16 her probation, what would happen to her children. That  
17 instance, along with all of the other ones the evidence  
18 presented; the spoof call, the Jordan Green messages, CPS  
19 scares, those were all the tools the defendants used to control  
20 and exploit.

21           I want to walk you through the charges. You  
22 have the law in front of you. The judge read it to you.  
23 That's the law that guides this case. And as we go through  
24 them, I'm going to be sure to point out evidence in support.  
25 But remember, all of the evidence you heard this week,

1 everything that came from that witness stand, these documents,  
2 is for your consideration. And that the words of the lawyers,  
3 any one of us, it's not evidence.

4 Looking at Count 1, Conspiracy to Commit Wire  
5 Fraud. The basic elements are that William Stone and  
6 Joe DeLeon conspired to unlawfully defraud Casi Thompson of  
7 money or other property. The essential elements: That there  
8 was an agreement to commit the crime of wire fraud; that the  
9 defendants each knew this plan was unlawful or a crime; that  
10 they joined in this willfully to further that unlawful purpose.

11 So in layman's terms, let's get down to the  
12 nitty-gritty. What does that mean? What do we have to prove?  
13 There was an agreement between the defendants. Each defendant  
14 understood the plan was unlawful. They intentionally and  
15 knowingly joined in, even just on one occasion; and they did so  
16 with the intent to deceive and deprive another of money or  
17 property.

18 But let's talk about what we don't have to  
19 prove. We don't have to prove that there was any kind of  
20 formal agreement. There was no need for a contract; there was  
21 no need for a full-on sit-down, let's lay this plan out. We  
22 don't have to prove that. The law says so.

23 We don't have to prove that anyone involved in  
24 the conspiracy had knowledge of all the details of the  
25 conspiracy. We don't have to prove that each of the defendants

1 were in agreement to all the details of the conspiracy. And we  
2 don't have to prove, for the conspiracy purpose, that each  
3 defendant or either defendant actually committed wire fraud.

4 To break this down even further, one thing I  
5 think is important to note that we also don't have to prove, we  
6 do not have to prove whether Joe DeLeon believed the secret  
7 probation was real or not. That's what the law says.

8 And so I want you to keep that --

9 MR. SELLERS: Can we approach, Your Honor?

10 (Sidebar conference, off the record.)

11 (Jurors exit courtroom.)

12 THE COURT: Please be seated.

13 So I hate to interrupt closing arguments, but we  
14 need to nail something down here.

15 So all right. Outside the presence of the jury,  
16 what is your objection, Counsel?

17 MR. SELLERS: Our objection is that this is a  
18 misstatement of the law in that she's telling them that Joe  
19 didn't even have to know about the scheme or artifice to  
20 defraud being real.

21 THE COURT: Where in the charge do we go through  
22 that? Help me with that.

23 MR. SELLERS: That is going to be in the  
24 substantive section of Count 1. And just so the record is  
25 clear, she has displayed a slide to the jury that says, we

1 don't have to prove. And in red it says, whether DeLeon  
2 believed secret probation was real. And we object to the slide  
3 and the statement.

4 THE COURT: Okay. Government, what's your  
5 response?

6 MS. RUDOFF: Your Honor -- may I go ahead?

7 THE COURT: Go ahead.

8 MS. RUDOFF: Yeah, on Page 16, under Conspiracy,  
9 it specifically says that they don't have to know all of the  
10 details on the unlawful scheme. And so the scheme and the plan  
11 here is to -- well, we believe that Joe DeLeon knew it wasn't  
12 real. But even if he thought the probation was real, there is  
13 evidence to show he knew to take money, property from a  
14 criminal defendant probationer is unlawful and is a crime under  
15 those pretenses.

16 THE COURT: Gotcha. So you are saying this  
17 falls within the not knowing all the details.

18 MS. RUDOFF: Not knowing all the details, Your  
19 Honor. And that the object of the conspiracy is to defraud  
20 Casi Thompson under the basis of a probation, not whether the  
21 probation was real or not.

22 THE COURT: Okay.

23 MR. GALLIAN: If I may be heard, Judge?

24 THE COURT: Sure.

25 MR. GALLIAN: Pulling from the superseding

1 indictment; specifically Page 3, Paragraph 9, Objects of the  
2 Conspiracy, the object of the conspiracy was to unlawfully  
3 defraud C.T. of money and other property in return for Stone  
4 and DeLeon's purported involvement in C.T.'s fictitious federal  
5 probation. We join in DeLeon's objection, Your Honor.

6 THE COURT: All right.

7 MS. RUDOFF: And, Your Honor, may I respond?

8 MR. WESTFALL: May I say one more thing, Your  
9 Honor?

10 THE COURT: Yes.

11 MR. WESTFALL: At Page 15, where it actually  
12 sets out the elements, the second element is that the defendant  
13 knew of the unlawful purpose of the agreement. And in -- I  
14 mean, that is another way of saying exactly what they've told  
15 the jury that they don't have to prove, Your Honor. I think it  
16 lowers their burden of proof.

17 THE COURT: You've got your appellate here.  
18 What's she say?

19 MS. RUDOFF: Your Honor, I -- may I ask her to  
20 come up?

21 THE COURT: Sure.

22 MS. RUDOFF: And I did speak with appellate  
23 prior.

24 THE COURT: You-all talk amongst yourself for  
25 just a second. We've got to get the show back on the road, but

1 I'm going to talk to my lawyers back here for a minute.

2 (Brief pause.)

3 THE COURT: Outside the presence of the jury.

4 And I'll tell you, here's what we can't do, a bunch of  
5 objections during closings. So I understand this is -- this is  
6 in good faith. I'm not trying to get on to you about that.  
7 But just so we're clear, I'll let everybody be heard on this.  
8 But when I'm looking at the law, I don't think they have to  
9 know all the details. I think it is up to the jury as to what  
10 they decide or not.

11 So as -- from my read on this --

12 MR. SELLERS: Can the Court -- on Page 17, the  
13 first element of this is that the defendant knowingly devised  
14 or intended to devise a scheme to defraud. The scheme to  
15 defraud was the probation. She's telling the jury he doesn't  
16 even have to know about that.

17 THE COURT: That's not what I'm saying. I'm  
18 saying you have to look at all of this in context. So here is  
19 where I'm at on this. I have given them the law. You-all are  
20 arguing what the facts are. I want to instruct them when they  
21 come back that they are to determine what the facts are and to  
22 be governed by the law that I have given them.

23 What we're not going to do is split hairs. I  
24 mean, I understand -- I'm not saying you're not in good faith.  
25 You are. But I don't read this the way you do. So lay down

1 whatever you need to lay down for the record.

2 MR. SELLERS: Okay.

3 MR. WESTFALL: Nothing further for the record,  
4 Your Honor --

5 THE COURT: I'm sorry?

6 MR. WESTFALL: -- if you admonish them, just as  
7 you said, and we don't say this stuff anymore.

8 THE COURT: Because you guys are going to  
9 disagree a lot on the facts.

10 MR. SELLERS: The facts are one thing; the law  
11 is another.

12 THE COURT: I know.

13 (Sotto voce discussion.)

14 THE COURT: And I -- Mr. Sellers, I want to  
15 caution you. I know you can be very passionate, and that is  
16 fine. I want you to represent your client and be zealous. Do  
17 not get cute with me. So I've read this. So don't make any  
18 sidebars, all right?

19 All right. So here's what I'm going to do. I'm  
20 going to instruct them to come in. They are to be governed by  
21 the law that I've given them. They are to determine what the  
22 facts are there. I understand your objection. I think that  
23 this falls within the province of the jury. And so I'll -- I  
24 will instruct them appropriately.

25 Are there any other objections that need to be

1 made at this time?

2 MR. WESTFALL: Not at this time, Your Honor.

3 MR. GALLIAN: No, Your Honor.

4 MS. RUDOFF: Your Honor, may I just clarify?  
5 Because I think Mr. Westfall had said something about me not  
6 speaking about it again. But my understanding is that I can  
7 continue to speak about this in my argument.

8 THE COURT: I'm overruling the objection.

9 MS. RUDOFF: Thank you, Your Honor.

10 THE COURT: And I will instruct them to  
11 determine the facts as they found them. So and --

12 MR. SELLERS: May I have a running objection so  
13 I don't have to do it again?

14 THE COURT: No, no. I mean, if you think  
15 you've -- state your position. And -- but if you think you  
16 should object every time they have a fact you disagree with, or  
17 if you think they're getting into something that they should  
18 have to prove by law, I'm the judge of the law. Preserve it  
19 for appeal. And if you feel like you need to reurge it, you  
20 can. But I'm not going to give you a running objection to  
21 everything.

22 MR. WESTFALL: That is fine.

23 THE COURT: And I'm just -- I'm just saying,  
24 both sides are going to say things the other side doesn't like.  
25 So I'm not going to kick the jury out every time. So I



1 understand you're advocating. I'm not trying to get your tail  
2 for that.

3 MR. WESTFALL: May I say one more thing for the  
4 record?

5 THE COURT: Certainly. Of course.

6 MR. WESTFALL: Whether DeLeon believed the  
7 secret probation was real, our position is they are making a  
8 statement of law, not fact. They're trying to tell the jury  
9 that they don't have to prove something. And -- and so  
10 that's -- that's our big complaint. Not any sort of a  
11 disagreement about facts.

12 THE COURT: Okay. And so can you point to me  
13 specifically -- we've got them kicked out now. Point to me  
14 specifically as to what you think -- why you believe that to be  
15 so.

16 MR. WESTFALL: Because the second element of  
17 wire fraud, Page 15 --

18 THE COURT: Okay.

19 MR. WESTFALL: -- is that the defendant knew of  
20 the unlawful purpose of the agreement. And the -- the first of  
21 the substantive wire fraud, I guess, on 17, is that the  
22 defendant knowingly devised and intended to devise what -- this  
23 statement, what she had up there --

24 (Brief interruption.)

25 MR. WESTFALL: So the statement that they made

1 is actually of law and it actually undercuts their necessity to  
2 prove intent.

3 THE COURT: So is it your position that the  
4 unlawful purpose of the agreement was the secret probation; is  
5 that what you're saying?

6 MR. WESTFALL: That's what's alleged in the  
7 indictment, Your Honor.

8 THE COURT: What is your response, Government?

9 MS. RUDOFF: Your Honor, the -- the purpose of  
10 the conspiracy, under the indictment and the law in this case,  
11 is that the intent was to financially benefit from Casi  
12 Thompson's belief in a secret probation. If this were even a  
13 real probation, the acts would still be crimes under the law.  
14 So whether it's fake or not is not the consideration.

15 Additionally, Your Honor, with regards to having  
16 to prove every element of wire fraud, as the Court knows in the  
17 charge, we do not have to do that for purposes of the  
18 conspiracy.

19 THE COURT: And, Mr. Gallian, you have anything  
20 you need to lay down?

21 MR. GALLIAN: Nothing further, Your Honor.

22 THE COURT: I agree. I think that the unlawful  
23 purpose is larger than that, yeah.

24 (Sotto voce discussion.)

25 THE COURT: So all right. Let's bring them back

1 in. I don't plan to kick them out again. So any objections  
2 you have you'll need to make them live.

3 And with that being said, obviously don't give  
4 them anything -- I sided with you on this one. I think the  
5 scheme is larger than this particular point. But I'm not  
6 saying waive making objections. You are doing your jobs as you  
7 should, so keep doing it. And I'll just -- we'll take it from  
8 there.

9 All right. Thanks, guys.

10 (Jurors enter courtroom.)

11 THE COURT: All right, everybody please be  
12 seated. Thank you all for your patience.

13 So before we go back to closing arguments,  
14 remember that you are the judges of the facts, I am the judge  
15 of the law. I have given you the law that governs this case  
16 and you are to be bound thereby. But you will determine what  
17 the facts are.

18 With that said, you may proceed.

19 MS. RUDOFF: Thank you, Your Honor.

20 Based on what the law tells us and the facts of  
21 this case, the government does not have to prove whether  
22 Joe DeLeon believed the secret probation was real or not.  
23 Because even if the secret probation was real, there could  
24 still be a scheme and intent to defraud on the basis of Casi  
25 Thompson believing she's on probation and believing she has to

1 pay these individuals for their services as a result of that  
2 probation.

3 And the evidence you've seen this week shows  
4 that there was an agreement between Stone and DeLeon, and that  
5 agreement was to carry out Casi Thompson's secret probation.  
6 That they had an intent to financially benefit from Casi  
7 Thompson's belief in the secret probation, and that each knew  
8 it was unlawful to financially benefit from the secret  
9 probation.

10 Now, there were multiple false  
11 misrepresentations related to whether or not each defendant  
12 knew it was unlawful to financially benefit. But this is what  
13 the evidence shows.

14 Let's walk through the agreement. How do we  
15 know? I told you at the beginning of this trial that this  
16 wasn't going to just be the basis of Casi Thompson -- what Casi  
17 Thompson said. This was going to be about facts and evidence  
18 and documents. And that's why we took the time to put that in  
19 front of you. That's what this case is about.

20 And where it started was when Bill Stone told  
21 Casi Thompson you are on secret federal probation in 2015. We,  
22 as in Bill Stone and Joe DeLeon, are the only individuals able  
23 to carry out the administration of this secret probation. You,  
24 Casi Thompson, financially owe us for our time and efforts  
25 related to the secret probation. You, Casi Thompson, need to

1 pay for travel expenses related to this secret probation.  
2 Keeping your children depends on our involvement in the secret  
3 probation. Failure to comply with our directions means prison,  
4 50 years.

5               As a result, you heard evidence DeLeon and Stone  
6 agreed to serve as Casi Thompson's probation officers for the  
7 secret federal probation. DeLeon and Stone, you heard evidence  
8 of and you saw the 3x5 cards and the text messages, they both  
9 enforced the conditions of these probations -- this probation  
10 to Casi Thompson. And both Joe DeLeon and Bill Stone accepted  
11 money and property from Casi Thompson as a result of their role  
12 in the secret probation.

13              And Casi told you what these conditions of the  
14 secret probation were. You see them here. Commit no new  
15 offense, account for all activities and whereabouts, which had  
16 to be provided on a 3x5 card. Spend designated time on phone  
17 and in person with DeLeon and Stone. Not allowed to travel  
18 unless given permission and granted by the Court. Not allowed  
19 to date unless that individual is vetted and goes through a  
20 background check by Bill Stone. And you must pay costs  
21 associated with probation.

22              Casi Thompson thought the purpose of this secret  
23 probation and these conditions were to protect and serve. But  
24 the evidence told us it was simply to control and exploit.  
25 Because for Casi Thompson, the next four years of her life

1 included that she could not tell anyone about this secret  
2 probation.

3 All her phone calls and texts were being  
4 monitored. There was evidence that that actually happened to  
5 her. You saw messages where Bill Stone and Joe DeLeon were  
6 conducting physical surveillance of her as she moved about  
7 town. You saw the document where she had to give over  
8 financial power of attorney to Joe DeLeon.

9 For Casi Thompson, the reality of this secret  
10 probation, she lived in constant fear. She told you that she  
11 experienced mental and emotional isolation because she was  
12 living a life that she had to keep secret from everyone,  
13 because her life depended on it, is what she was told.

14 The reality was Casi Thompson had to have every  
15 vulnerability and aspect of her past, the past she had worked  
16 so hard to come away from, and had pulled herself away from it,  
17 that was all brought up again and used to exploit her. Casi  
18 Thompson told you she suffered in a state of silence about this  
19 secret probation and the fears she was experiencing for four  
20 years.

21 We showed you evidence about what else happened  
22 to Casi Stone -- or Casi Thompson, excuse me, and what her  
23 reality of this secret probation was. In Government  
24 Exhibit 155 and 172 there was a call on August 15th, 2019, and  
25 it was between Casi and Bill Stone. Casi says, you've got a

1 pretty good setup over there. Bill Stone says, yeah, yeah.  
2 I've got a good setup. Definitely. Casi says, you're welcome.

3 What does Stone say? Well, thank you.

4 Casi then, in that same call says, that's the  
5 other thing. I can't even afford to put myself back through  
6 school to get my social work degree. Why? Because she had  
7 been forced to give over more than \$700,000 in a one-year  
8 period of her money to Joe DeLeon and Bill Stone. This was the  
9 other reality for Casi Thompson.

10 Let's talk about the reality of the secret  
11 probation for Joe DeLeon. Joe DeLeon's text messages and  
12 phone, no evidence they were being monitored. In fact, when he  
13 got off recorded calls with Casi or with the agents, he texted  
14 Stone to let him know he was done. If Bill Stone could read  
15 his messages and could tell when he was on the phone, why would  
16 Joe DeLeon do that?

17 Joe DeLeon knew he was not being surveilled and  
18 monitored. No evidence of physical surveillance of Joe DeLeon.  
19 No evidence that Joe DeLeon had to continue with this secret  
20 probation because he feared prison. No exploitation of his  
21 vulnerabilities, his past experiences. And there's no evidence  
22 that he was isolated from friends, family or relationships.

23 But what did Joe DeLeon get out of this? He got  
24 to pretend to have a purpose, power, importance. We know he  
25 got a \$15,000 check. We showed you that check, the text

1 message, evidence of it. 30 days into this probation,  
2 Joe DeLeon had to believe 30 days of his work as a probation  
3 officer sufficed for \$15,000. And he had never received gifts  
4 from Casi Thompson before. Gifts, as they like to say. All  
5 the years he had helped her, all the years he had supported  
6 her, no money exchanged. But now, there's money on the table.  
7 And Joe DeLeon took it.

8 He also got a brand-new F-150 30 days after he  
9 gets a \$15,000 check. So for 60 days of work, the evidence  
10 shows 60 days, Joe DeLeon thought as a probation officer he was  
11 entitled to a \$40,000 truck from the same probationer who just  
12 gave him 15 grand? That's not a gift. That's not just a lie;  
13 it's a crime. The evidence showed that Joe DeLeon got more  
14 than \$50,000 as a result of his involvement in Casi Thompson's  
15 secret probation.

16 Let's talk about the reality of the secret  
17 probation for Bill Stone. Bill Stone, at this point the  
18 evidence has shown a retired FBI agent. No more badge. No  
19 more gun. No more power. What did he get out of the  
20 probation? He too got to pretend he had a purpose; that he had  
21 some kind of power, and that some way, somehow he was  
22 important.

23 We also showed you his financials. This is what  
24 Bill Stone was able to attain in the very first year of secret  
25 probation. His very first year of retirement. The calendars



1 told you he was debt free. His house was paid for, \$110,000  
2 Mercedes paid for. Tacoma, brand-new Tacoma paid for. His  
3 house was paid for. By who? Casi Thompson. Why? Because she  
4 believed it was necessary to secure her secret probation and  
5 maintain her freedom.

6 Here's a picture of the house. We showed you  
7 the evidence. That house was bought by Casi Thompson, yet  
8 she's nowhere on the deed, nowhere on the title. Never once  
9 lived there. Never once even kept an article of her own  
10 clothing there. That is not Casi Thompson's house. That was  
11 Bill Stone's. Casi Thompson was just forced to pay for it.

12 Here's a picture of the Mercedes. Bill Stone  
13 got this Mercedes in portion from a cashier's check that Casi  
14 Thompson believed she had to give over, 76,000. How did he get  
15 the other 43,000? He traded in Casi Thompson's Lexus that just  
16 days before he had told Casi Thompson someone planted drugs in.  
17 What was Casi Thompson's response? I can't have anything to do  
18 with that; I'm on probation. I can't risk my children. I  
19 can't risk my freedom. Take it. The words Bill Stone wanted  
20 to hear.

21 Toyota Tacoma. Now, remember at this time Bill  
22 Stone is telling Casi that he doesn't even live in Dallas, yet  
23 he has two cars. All a part of the different lies. What else  
24 did he get? He got financial freedom for a while. Go look at  
25 the calendars, Government's Exhibit 92A through 98A. You will

1 see that while Bill Stone was receiving payments in 2015 and  
2 2016 from Casi Thompson as a result of this secret probation,  
3 he was living financially free. So much so that even in 2017  
4 and 2018 and 2019, when he wasn't getting payments from Casi  
5 Thompson, he was still able to be debt free.

6 He didn't have a car payment. Didn't have a  
7 house payment. Cash in the bank. And the records show you he  
8 started receiving his full retirement. In the fall of 2016,  
9 Bill Stone's \$700-a-month payment that he was getting from his  
10 pension went considerably up. He had almost double the source  
11 of income legitimately, plus everything he got unlawfully from  
12 Casi Thompson.

13 Also in the calendars -- that's what Casi  
14 Thompson was to him. Not a girlfriend, not a fiancée. It was  
15 a project. A project to keep him debt free. And a project to  
16 make him feel like he had some sort of power.

17 Go look in the calendars. It's evidence. Look  
18 at the kind of things Bill Stone writes down. You'll find it's  
19 very detailed. You'll find it's very specific. And when he  
20 talks about Casi Thompson, even engaging in sexual acts with  
21 her, he refers to her as project or pro.

22 Does that sound like a relationship? Bill Stone  
23 also got more than \$700,000 in money and property out of this  
24 secret probation. And remember the evidence we showed you. Go  
25 look back. That happened between December 2015 and

1 December 2016. 700,000.

2                   How else do we know that there was an agreement  
3 between the two to defraud Casi Thompson? We showed you  
4 evidence of the vehicle titles. Casi Thompson testified that  
5 in each instance she was brought the document to transfer title  
6 from the truck to Joe DeLeon, and she was brought the document  
7 from Bill Stone for the Lexus. Yet both, within days of each  
8 other, have the same sales price listed. And not a round  
9 number like 20- or 25,000, 30,000. No, not that. 20,100.  
10 It's evidence of agreement.

11                   Here you see the Lexus. Evidence of agreement.  
12 The two talked it out. They figured it out together.

13                   We also showed you that they both financially  
14 benefited from the conspiracy. We've already talked about  
15 evidence of the \$15,000 check. And go back and listen to the  
16 recorded calls. Ranger Briley's interview of Joe DeLeon.  
17 Doesn't bring up the \$15,000 check. Just doesn't. He  
18 specifically asked, did you receive any property, monetary?  
19 What does he say? Piddly stuff. But I bought a truck. No  
20 mention of a \$15,000 check.

21                   And we heard evidence that Casi confronted Bill  
22 Stone about this. It's Government's Exhibit 155 and 172. Casi  
23 said in that call, I've always brought up the fact that Joe  
24 should not have gotten that truck. And I've always griped  
25 about the fact that I had to pay 120-something thousand dollars

1 in restitution that I don't even have proof actually went to  
2 the place. You know, Eric, all that stuff when you used to  
3 tell me about like him?

4 She's mad in that call. Go listen. You guys  
5 heard it. Because she realizes she's being defrauded.  
6 Exploited. What's Bill Stone's response? Well, I'm sorry you  
7 feel that way, Casi.

8 Now, in opening statement, Mr. Gallian, Bill  
9 Stone's lawyer, told you, listen to the things on the calls  
10 Casi says to Bill Stone, and listen to his responses. And I  
11 agree. Because it tells you everything you need to know.

12 We also saw the \$250,000 cashier's check that  
13 Casi believed she had to give in restitution. And how do we  
14 know that there was a mutual intent to defraud Casi Thompson?  
15 We showed you evidence of these checks. The first one,  
16 Joe DeLeon writes to Casi Thompson for how much? 20,100.  
17 Remember, that's the same amount written on the transfer of  
18 title for Lexus.

19 Two weeks later, Joe DeLeon says, Casi, write me  
20 a check back. Yet every single time Joe DeLeon meets with  
21 Ranger Briley, and even Special Agent Brian Luley, he continues  
22 to say, I bought the truck. I have the check. See, I have a  
23 paper trail. If you don't think you are doing something wrong,  
24 if you're not committing a crime, why are you creating a fake  
25 paper trail?

1                   And if this was a gift -- which we've heard no  
2 evidence to suggest. No evidence to suggest that this was a  
3 gift. Casi Thompson told you it wasn't. That call she told  
4 you it wasn't -- even if it was a gift, why does Joe DeLeon  
5 himself, in every single recording, continue to tell law  
6 enforcement, I purchased it? I purchased the truck. But now  
7 it's a gift?

8                   Because if it's a gift, is it a crime?  
9 Joe DeLeon hadn't thought that through.

10                  Further intent to defraud Casi Thompson. We  
11 showed you text messages between Joe DeLeon and Bill Stone.  
12 This is dated in 2018. Joe DeLeon says: Somebody's got to  
13 make some money. I sure am not doing it. Bill Stone responds:  
14 Well, I remember not too long ago 3 million reasons for you to  
15 get married.

16                  Casi Thompson inherited \$3 million. Their  
17 project. What does Joe DeLeon respond? I would not marry her  
18 back then for more -- back then for 3-plus million reasons. I  
19 would not marry her if she's the last woman on earth, so help  
20 me God. I made that promise in church one day and I'm not  
21 going back on that promise.

22                  Does that sound like the kind of relationship  
23 where you are getting \$15,000 gifts from the person you are  
24 speaking so poorly of, or that your only focus in speaking  
25 about them is the money they inherited?

1                   It's an intent to defraud. How else do we know  
2 Joe DeLeon was in on this intent to defraud? I showed you the  
3 progression of their relationship through the cell phone.  
4 Joe DeLeon had Casi Thompson's number since 2010, 2012. And  
5 over time it progressed. And it matched the progression that  
6 Casi told you about the relationship. They started to get  
7 closer. He was being supportive of Casi. She leaned on him.  
8 No request for money, but the relationship grew. And when  
9 their relationship grew, we see that he figures out how to  
10 spell her name. Makes sense, right? And from November 2014 to  
11 September 2015, she still exists in Joe DeLeon's phone as Casi  
12 Thompson, spelled correctly.

13                   Days after this secret probation starts,  
14 Joe DeLeon goes into his phone and changes her to Project  
15 Number 2. To Joe DeLeon and Bill Stone, she was no longer a  
16 person. She was a project. And she was their source of money.

17                   Casi, again, is having a call -- we played this  
18 for you -- with Bill Stone. She tells Bill, I think you should  
19 try to get that money back for me from Joe. He didn't deserve  
20 that. For what?

21                   What does he respond? Casi, I don't talk to Joe  
22 hardly. But if you want me to, what do you want me to say?

23                   It's a lie by Bill Stone. We entered his toll  
24 records. Around this time in 2019, him and Joe DeLeon were  
25 talking quite often. Why is he lying to Casi Thompson about

1 when he speaks to Joe? What's he trying to cover up? His  
2 connection and communication? His attempts to keep Casi  
3 Thompson under the guise that this secret probation exists?  
4 Because with that comes what? Control, exploitation and a  
5 coverup of the crimes.

6                   Casi then in that same call responds: I mean, I  
7 don't know what to say. You can try. I mean, you know what to  
8 say.

9                   Bill Stone says: You know what, I will. When I  
10 get back, I'll do it. I'll go meet with him and I'll talk to  
11 him.

12                   Never happened. They met. There's evidence of  
13 it. They talked. There's evidence of that, too. Never about  
14 getting Casi her money back that she was exploited out of.

15                   Further of intent to defraud. We told you that  
16 Government's Exhibit 98A, the calendar for 2020 that was found  
17 neatly placed on Bill Stone's desk during the search warrant --  
18 not hidden. Go look at it -- it's blank until May 2020. Then  
19 you see entrance -- entries. They don't match the real 2020  
20 calendar that Don Stoner and Ranger Briley said were hidden  
21 behind trash can liners. It doesn't match. Go compare them  
22 for yourselves. They're evidence.

23                   Why would Bill Stone start creating a new  
24 document, a fake document of what he's been up to in May of  
25 2020? Well, because that's when Joe DeLeon told him, hey,

1 Department of Justice is investigating us. It's trying to  
2 cover it up. And he tried to hide it. There's the real  
3 March 2020. There's the fake.

4 Further intent to defraud, July 2019, around the  
5 spoof call -- I'm sorry, June 2019. June 18th, spoof call to  
6 Project. Project suspicious of me.

7 Casi starts to wonder, starts to question. What  
8 does Bill Stone do? He needs to silence her. Joe DeLeon needs  
9 her to be silent, too. Because if she talks, the crimes come  
10 out.

11 Casi breaks up with me. He increases  
12 surveillance. Bill Stone brings in Joe DeLeon. If Bill Stone  
13 is just worried about his girlfriend breaking up with him in  
14 June of 2019, why does he need Joe DeLeon's help? Why does  
15 Joe DeLeon want to help him? Because they both have crimes to  
16 cover. And the only way to keep them covered is to keep Casi  
17 Thompson quiet and under their control and further  
18 exploitation.

19 May 2020. Bill's doing surveillance. Casi  
20 Tahoe gone, Granbury. Joe visit OIG. Saw Joe; got intel. We  
21 told you the evidence showed that in between those recorded  
22 calls, the two of them were meeting and talking. Intel, to use  
23 that word, Joe DeLeon's not cooperating with law enforcement.  
24 He's making calls, yes. He's cooperating with Bill Stone.

25 At the point in which we know, and evidence



1 shows, he is aware fully this probation is not real; and that  
2 to have engaged in it and receive money in return is a crime.  
3 That's why Joe DeLeon is involved at this point in time even.  
4 That's why Joe DeLeon is trying so nicely to offer his services  
5 to law enforcement. It's continuing to control. Control the  
6 narrative, control the situation, cover their crimes.

7               Counts 2 through 7, wire fraud. I'm going to go  
8 through these quickly because we spent a lot of time talking  
9 about financials. And as much as Andy Latham probably enjoys  
10 them, I don't know that that's everybody's take on the -- the  
11 records and the numbers. But you have the evidence. It's  
12 there and you can check it.

13               So for wire fraud, Counts 2 through 7, this is  
14 just with regards to Bill Stone. Count 1 is Joe DeLeon and  
15 Bill Stone. And you have the law in front of you. Which  
16 states that Joe DeLeon -- we don't have to prove, for purposes  
17 of the conspiracy, that wire fraud was actually committed. But  
18 for purposes of Counts 2 through 7, for Bill Stone, which are  
19 wire fraud counts, we do have to prove that the offense was  
20 committed. And we've done that.

21               Schemed to defraud, employed false material  
22 representations and transmitted or caused to be transmitted by  
23 way of wire and interstate commerce. That's my least favorite  
24 element because it is the most confusing. Fortunately for you  
25 guys there is a stipulation by the parties. It's in your

1 charge. That's been proven. You don't have to worry about  
2 that.

3 Mr. Gallian stood up in opening statement and  
4 said this comes down to one thing. Bill Stone didn't have an  
5 intent to defraud. Well, that is one of the elements we have  
6 to prove, a specific intent to defraud. What does that mean?  
7 Well, a conscious knowing intent to deceive someone and to  
8 cause loss or harm.

9 So what evidence did we do of Count 2? We had a  
10 cash withdrawal, \$9,000, on or about June 3rd, 2016. Here's  
11 the cash withdrawal. Casi Thompson, June 3rd, 2016, \$9,000.  
12 Here's the text messages that support it. Why do these text  
13 messages matter? Because Casi Thompson told you any time there  
14 was some legal crisis or crazy drama going on with her  
15 probation or her legal situation, Bill Stone said, Casi, I've  
16 got to travel for the work I'm doing for you. I need you to  
17 pay for my travel expenses. And she did. She would. That's  
18 what this 9,000 was for.

19 We also know that money went to Bill Stone  
20 because Bill Stone told us. It's in his calendar. Joe,  
21 Project 2: Post office, money. And then we see him deposit  
22 cash. Which Andrew Latham told you, at that point in time,  
23 other than the \$700 he was getting per month from his pension,  
24 he didn't have another legitimate source of income. There was  
25 nowhere else for the money to be coming from.

1                   So how do we know that -- about this lie? About  
2 the travel and the \$5,000 withdrawals? Well, Casi told you.  
3 But there is also evidence to support it.

4                   On 1-4, we see the \$5,000 cash withdrawal. Now,  
5 this isn't one of the indicted wire fraud counts, but we see  
6 it. We also see a calendar entry saying Bill Stone and Casi  
7 Thompson met the same day. We then see, a couple days later,  
8 text messaging, Bill Stone and Joe DeLeon. What's Bill Stone  
9 doing? Says he's traveling. We know from the toll records he  
10 was in the Dallas/Fort Worth area the entire time. But Casi  
11 gave him money because he said he was traveling for her  
12 probation.

13                   February 22nd, 2016, Casi deposits that check  
14 from Joe DeLeon in response to the check she already gave him,  
15 and she gets \$5,000 cash back. Same day: Dinner with Joe,  
16 Project. Money. Went to Bill Stone.

17                   Two days later, text message: Did you make it  
18 to Washington? Bill Stone says he's traveling. That's why  
19 Casi gave him that money. We see March 4th, 2016, Bill Stone  
20 says -- I'm sorry, March 3rd, Just landed in Austin. Any  
21 project stories? Joe DeLeon responds, Yeah, she just went to  
22 the bank. What does Bill Stone say? Okay. I'll head and meet  
23 you there.

24                   Casi Thompson leaves the bank, goes and meets  
25 Bill Stone. And we know that because Bill Stone told us.

1                   Dinner with Project, Dave and Buster's, dollar  
2 sign.

3                   We also know, because it is in the recordings,  
4 Casi confronted Bill about it. Government's Exhibit 143 and  
5 144. Casi says, And then every time you took a flight, I had  
6 to pay you \$5,000. I just don't understand what was so  
7 expensive.

8                   And Mr. Gallian told you pay attention to  
9 Stone's response. What does he say? I can't answer that. I  
10 don't know. He doesn't respond and say, Casi, what are you  
11 talking about? What 5,000; what money; what travel? I was in  
12 Dallas. That's not what he says. Why? He knows he's being  
13 recorded. He knows there's an investigation. And Bill Stone  
14 and Joe DeLeon believed if they could keep up the fact that  
15 this probation was real, law enforcement would back off.  
16 Because in their mind, it was just the rangers; not federal law  
17 enforcement. And that's what their goal was. Casi asks again,  
18 5,000 every time you fly?

19                   Count 3 is the cashier's check payable to Park  
20 Place Mercedes. I won't belabor this more. Those are the  
21 elements, and here is how we met them. You've seen the checks.  
22 Then Casi told him in a call, you know, I buy you a \$120,000  
23 car, and it would be worth it if I did get this probation. But  
24 if it was not real, then why did you accept the money?

25                   What does Bill Stone respond? Casi, you know

1 what, we've gone over this. Beat this dead horse.

2 We also see more evidence to support it. Picked  
3 up vehicle. Breakfast with Joe. Looked at new cars. The  
4 cashier's check was related to the probation.

5 Count 4, wire fraud. Cash withdrawal, 5,000, on  
6 or about June 24th, 2016. The law in front of you tells you  
7 that these dates are on or about. So if a \$5,000 withdrawal  
8 did not happen on June 24th, 2016, but happened around that  
9 same time, it's still enough to support the count. And we  
10 showed you that. There is a \$5,000 withdrawal on May 25th,  
11 2016, and the law says that is sufficient for the date.

12 And we see more text messages in support,  
13 Count 5, wire fraud. Cashier's check payable to Toyota of  
14 Grapevine. Dates, checks, Bill Stone tells us.

15 Count 6, wire fraud. Cashier's check payable to  
16 Bill Stone. 154,500. I poorly did the math with Casi, if you  
17 guys remember that far back, when we were talking about the  
18 house. But between the \$250,000 restitution check she gave  
19 Bill Stone and the 154,500 for the house, was more than what  
20 Bill Stone paid in cash without a mortgage, without a lender,  
21 for that home. And that was on or about September 13th, 2016.

22 Count 6, wire fraud. There's that check. Meet  
23 and feed the project. Pick up check. And we later see Bill  
24 Stone deposit it.

25 Casi confronts Bill Stone. We played the call

1 for you. What does he say? I'm sorry it's pissing you off,  
2 Casi. I really am sorry. Doesn't offer to give the money  
3 back. If this was about a relationship, why not give the money  
4 back? Why continue the lie?

5 Count 7, wire fraud. Mr. Gallian, in defense  
6 for Mr. Stone, brought in a woman who worked on this design.  
7 And she told you, yeah, Casi and Bill were engaged in 2016.  
8 And when we asked her specifically about that. She said, well,  
9 she was wearing a ring on her left finger, and her boss told  
10 her they were a couple.

11 That's not evidence. Casi Stone -- or Casi  
12 Thompson told you. Defense counsel asked her, so you wear a  
13 ring on your left finger? She says, yeah, pretty common. I do  
14 it a lot. Mr. Gallian said, so you're wearing one right now?  
15 What did Casi do? She lifted up her left hand. What was she  
16 wearing? A ring.

17 That wasn't planned. It is just truth. It is  
18 just facts. Casi was telling the truth. And Kelsey Adams  
19 simply made an assumption. Assumptions, they are not fact.  
20 It's not evidence.

21 Count 7, wire fraud. We see the checks. We see  
22 the calendar entries. Casi then confronts Bill about it. She  
23 says, You think everything you did was worth half a million  
24 dollars for the secret probation? He says, I don't know what  
25 that money was. It was so long ago, I can't really remember.

1 Bill Stone lies: I don't remember that kind of  
2 stuff right now. Yes, he does. He kept a calendar of it. All  
3 the way back to 2015. Denial. Lies. Deflection.

4 Count 8, money laundering. There's a lot of  
5 elements here. But this relates to the money that Casi  
6 Thompson gave Bill Stone as a result of the secret probation,  
7 criminally derived property and proceeds then used in a  
8 transaction for the house. That's money laundering. And we  
9 proved it. The evidence meets all of those elements. There  
10 was the 250,000; we walked you through that. Bill Stone  
11 deposited it. He then writes a check for the house.

12 Casi confronts him and said, I asked you if you  
13 would give me the money that I put into your home back when you  
14 sold it. You said you'd have to think about it. What does  
15 Bill Stone say? How is it rude? Casi: Because I feel like  
16 the \$100,000 vehicle that you are driving right now is  
17 compensation enough. Not gift; compensation. What does Bill  
18 Stone say? Sorry you feel that way.

19 False impersonation of a federal officer. That  
20 William Stone falsely assumed and pretended to be an officer  
21 and employee, acting under the authority of the United States  
22 or any department, agency or office thereof that is a special  
23 agent of the FBI.

24 While acting in that pretended character, Bill  
25 Stone demanded and obtained money and things of value, and he

1 did so knowingly and with the intent to defraud.

2 Here's the definition. It's in your charge.

3 Courtney Calloway came from FBI headquarters to tell you, there  
4 is no legitimate reason any active or retired agent should have  
5 these credentials. Not in that way, not in that number, not in  
6 that kind. You have the physical credentials. Feel them.

7 Touch them. You'll see the difference right way.

8 If Bill Stone is not impersonating an FBI  
9 officer to Casi Thompson, why does he have fake credentials?  
10 Why does he need them? Because Casi relied on it. Who he was  
11 in society. And you know who else he presented that to that we  
12 know was FBI [sic]? Penny Weisand. Penny Weisand didn't have  
13 a dog in this fight. She's a court coordinator. She works in  
14 the criminal justice system. She remembered in 2017 Bill Stone  
15 showed her an FBI credential badge. 2017.

16 We also saw text messages where Joe DeLeon  
17 clearly, at this point at least, knows Bill Stone's retired.  
18 How does a retired FBI agent act as a federal probation officer  
19 at that point? Joe DeLeon didn't really care. He had already  
20 gotten his money by then, right? But he still needed to keep  
21 the crime quiet.

22 These are not gifts to Joe DeLeon, because  
23 Joe DeLeon told us that. Briley says, What about vehicles?  
24 She gave me -- no, she didn't give me; she sold me a truck.  
25 And I got the check for it. He brought the check with him. I



1 don't know how many people walk around with proof of a check  
2 when going meet with law enforcement, unless they're really  
3 proud of the fact that they have it. Unfortunately it's a lie.  
4 And it's an intent to defraud.

5 DeLeon again, what about vehicles? She sold me  
6 a pickup truck, but I paid the sales tax. And I've got the  
7 proof of the check, and it says "purchase of the truck."  
8 Continually lying to law enforcement. Why? If there's no  
9 crime, why are you hiding the money? And why now are you  
10 saying it's a gift?

11 He says again, I bought a truck from her.  
12 September 17th, again: Sold it to me. I've got the paperwork.  
13 May 7th, Luley, the truck that she sold me? He's continuing.

14 Go back and look at the evidence in June 2018  
15 and July 2018, and compare it with June and July 2019.  
16 Something similar happened in both those instances. Bill and  
17 Casi are on a trip. They're in a relationship at both points  
18 in time that I'm referring to. They get in a fight. Casi  
19 says, I want to break up with you. What does Bill Stone do?  
20 Freaks out. Because he loves Casi so much? No. Because he  
21 needs to keep her quiet. So who does he call to help him?  
22 Joe DeLeon.

23 Joe DeLeon has not been involved in this secret  
24 probation for some time now. And the evidence supports that.  
25 Yet he jumps back in because Bill and Casi are having a

1 relationship dispute? No. He jumps back in because he knew he  
2 needed to help cover the crime he also committed.

3 The calendars are there. They're evidence. Go  
4 read what Joe -- or what Bill told you.

5 You heard from Darla Bell, you heard from Brad  
6 Leonard, evidence that both Joe DeLeon and Bill Stone deleted  
7 tens of thousands of text messages. If Bill Stone was truly in  
8 a relationship with Casi Thompson in 2015 and 2016, why would  
9 he delete those messages if that's what it showed? Casi  
10 Thompson told you that's not what it would show, but yet Bill  
11 Stone, the only messages recovered were from 2019. If it was a  
12 relationship, why aren't they there?

13 From the beginning of the trial, I told you  
14 about protect and serve. And that's what Casi believed. Bill  
15 Stone and Joe DeLeon had a different plan. They conspired,  
16 they engaged -- Bill Stone engaged in wire fraud, money  
17 laundering. They controlled. They exploited. They received  
18 money as a result.

19 But now Project Number 2, after 2019 she got to  
20 go back to being Casi Thompson. All of the evidence we showed  
21 you, all of the lies, the conspiracy, the coverup, the  
22 impersonation, the exploitation was sinister. It was evil and  
23 it was deceitful and it was criminal. That's why we ask you to  
24 return a verdict of guilty on all counts for the defendants as  
25 they're charged.

1 THE COURT: All right, members of the jury,  
2 let's take our lunch break. Let me instruct you, you -- you  
3 still have yet to hear the closing arguments of defense counsel  
4 for both sides. And so we are close to the point at which you  
5 can discuss the case, but we're not there yet. And so if you  
6 would hold off talking about the case until you have heard all  
7 of the closing arguments, the Court would be grateful.

8 With that said, please don't discuss the case  
9 until I've given you the green light to do so. And please  
10 don't do any independent research. And with that said, I'll --  
11 I'll join you back here in a minute to find out how long you  
12 guys would like for lunch, but we are in recess until then.

13 Anything further we need to take up before we  
14 excuse them?

15 MR. WESTFALL: No, Your Honor.

16 THE COURT: All rise for the jury. Thank you  
17 for your time and your attention.

18 (Jurors exit courtroom.)

19 (Lunch recess.)

20 (Jurors enter courtroom.)

21 THE COURT: Whenever you are ready.

22 MR. GALLIAN: May I proceed, Your Honor?

23 THE COURT: You may.

24 MR. GALLIAN: Members of the jury, I stood here  
25 not too long ago in my opening statement and I told you two

1 things. I told you that this case was about lies, lies and  
2 lies. And I told you that this was the weirdest case I have  
3 ever worked, I ever will work. And I'm sure all now of you --  
4 all of you can now agree.

5 I also told you that as a criminal defense  
6 attorney I was going to do something very weird. I was going  
7 to tell you the truth. The good, the bad and the ugly truth.  
8 And that is what we did. All the way through this case, I did  
9 not waste your time with silly questions. I did not waste your  
10 time asking questions to witnesses that had no relevance to us  
11 whatsoever. I asked questions when I felt that you guys needed  
12 to hear the answers. That's the sole purpose of how we tried  
13 this case and why we tried this case.

14 Beginning with my client, Bill Stone. I told  
15 you, in pursuit of that truth in opening, you were not going to  
16 like Bill Stone. That he was a bad guy and that he lied. And  
17 you got 20 minutes into that chambers phone call and you knew  
18 exactly what I was talking about. You probably hate him. And  
19 I don't disagree with you at that point.

20 But we need to look at the facts and we need to  
21 look at the story and how all of this unfolded to truly  
22 understand what happened. And I truly believe that at the  
23 beginning of this, Bill Stone had Cusi's best intention in the  
24 front of his mind.

25 At that point in time, in 2015, Myrna had just

1 passed away. She was on probation for the first time in her  
2 life, and she was starting to crumble under the pressure of it  
3 all. And Bill Stone concocted this horrible, at times  
4 psychotic, probation. Because let's be very frank about one  
5 thing. Casi, at that point in time, had had both of her  
6 children taken away from her. Multiple times. The only reason  
7 that Casi got her life together in 2015, the evidence very  
8 clearly shows, is because it was the first time in her life  
9 that a fear of prison was hanging over her head.

10 It wasn't the kids; it wasn't Cade; it wasn't  
11 Slayter. It was the fact that she very really thought that she  
12 could go to prison on that Hood County case. And so therein  
13 lies the premise of why Bill Stone did what he did.

14 It was messed up. It was wrong. But I admitted  
15 to it in opening so that you did not go all the way through  
16 this case listening, trying to figure out if the probation was  
17 real or not real. It was fake. It was all fake.

18 At the beginning, the intentions of this  
19 probation were very clear. Casi, take care of your kids. Do  
20 well in school. Write your daily activities on 3x5 cards, just  
21 like I do in my planner. That's it. Because all the other  
22 terms and conditions of her probation that she told us that she  
23 had to do, well, we asked some follow-up questions and those  
24 all fall like a house of cards.

25 At the end, however, this probation was very

1 much used as a way to control and to manipulate Casi Thompson.  
2 They go to Key West in the summer of 2019. Casi says I'm done.  
3 They're in a full-blown relationship at that point. She kisses  
4 a bartender. Bill Stone gets upset. But at the end of that,  
5 she realizes, I don't want to be in this relationship anymore.  
6 I don't want to be with you anymore.

7                   And so she starts to push back. That's why we  
8 hear the chambers call. Bill, for the first time ever, he puts  
9 it in his planner, spoof call. That didn't quite get Casi back  
10 to him, so he took it up another level. Brought in Darla Bell;  
11 a.k.a. Jordan Green, DEA agent. Turned up the heat a little  
12 bit more. And it worked. He and Casi got back into a  
13 relationship. In fact, they got engaged.

14                   But then shortly thereafter, Casi says this  
15 still is not a relationship that I want to be a part of. So  
16 Bill tries one more thing in an act of desperation. Dr. B  
17 dies. You know, the made-up Dr. B? And so then Bill sends  
18 funeral pictures from Dr. B's funeral. The only problem is it  
19 is a live photo. And Casi very clearly figures out it is a  
20 photo of a photo. It wasn't very well planned out. Casi right  
21 then realizes, I need to talk to somebody about this, and she  
22 sits down with Ranger Briley.

23                   The intentions at the beginning of this thing  
24 were far different than what he was doing at the end. The end  
25 is where we hear the spoof call. The end is where we hear the

1 DEA phone call. The end is when Dr. B dies.

2 Now, with those characters, when you keep up a  
3 lie, you have to keep up the lie. And as a lie gets bigger and  
4 bigger and bigger, well, apparently so do the characters.

5 There are plenty of names: Chet, Jerry, Dr. B,  
6 Dr. Z. None of them exist. All a figment of Bill Stone's lie  
7 to convince Casi that she was on this probation, 100 percent.  
8 He didn't do it with the intent to defraud her of money and  
9 property. And that is clear.

10 I think what we realized -- at least what I  
11 realized when Casi was on the stand, is that I believe, at the  
12 end of the day, Casi cares about Casi. I think that Casi will  
13 do anything and will say anything in a moment to do what's best  
14 for her in that moment. We talked about the law enforcement  
15 that's in her life.

16 Kent Barnes, father of her oldest child Cade,  
17 works for the police department. Charles Tangney, private  
18 investigator; former Burleson police officer. Bill Stone,  
19 retired FBI agent. Joe DeLeon, interpreter for the Fort Worth  
20 Police Department. Mitch Galvan, chief of police, Granbury,  
21 rents her house. She surrounds herself with people, because I  
22 truly believe that Casi didn't trust herself enough to not have  
23 a couple of people that she could reach out to in a time of  
24 need.

25 And what did the prosecution elicit from her?

1 2005, 2007, 2010, '12, '14, when she had those issues, who was  
2 she reaching out to? She was reaching out to Joe DeLeon. She  
3 was reaching out to Bill Stone. She was reaching out to  
4 Charles Tangney. Those were the people that could help her in  
5 those situations, and that is exactly what she did.

6 Who wasn't she reaching out to? Any of her  
7 friends. The government called Daralyn. Daralyn Crites is a  
8 long-time friend of Casi Thompson's. And you'll see all the  
9 way through this -- I'm using transcripts from the trial so  
10 that there's no misunderstanding of what was said.

11 Question from me: Casi didn't tell you about  
12 the actual probation she was on?

13 No, sir. We didn't discuss that.

14 She didn't tell you about the Hood County  
15 probation?

16 No, sir.

17 Are you aware that probation started in 2015;  
18 discharged in '18?

19 No, sir.

20 She didn't tell you about the times that she was  
21 arrested?

22 No, sir.

23 Can we agree that you're finding some stuff out  
24 for the first time today?

25 Maybe a little.



1                   It didn't benefit Casi to tell her friend  
2 Daralyn that she had these problems; that she had these  
3 arrests; that she had these cases, because Casi cares about  
4 Casi.

5                   Casi lies when Casi sees fit. She lied to the  
6 government. The people that were here to help her, she lied  
7 time and time and time again. This is when I was questioning  
8 Ranger Briley.

9                   What was your understanding of their  
10 relationship, February through October 2015?

11                  From February 2015 to October 2015, probably  
12 minimal contact. Maybe talking on the phone some. Not much.  
13 They had a meeting before.

14                  How much, Ranger Briley?

15                  Maybe three hours.

16                  When I confronted him and I said that it was  
17 actually 40 hours, and I asked him if it was a red flag, he  
18 conceded and he said it was a flag. Not sure what that means.  
19 But he had no accurate understanding of what their relationship  
20 was in 2015. In fact, his guess of three hours was only a mere  
21 12 times off the actual amount that they spent on the phone in  
22 2015.

23                  She lies to who she needs to lie to at the time.

24                  Ranger Briley told Casi very clearly, make sure  
25 you record every phone call, because it would look bad to the

1 jury. She doesn't recall if he said that. But then said, I  
2 just know I was supposed to.

3 Ranger Briley confirmed the same. I remember  
4 telling her that if she had these other 50 conversations and  
5 you don't record them with Bill Stone, that's going to look  
6 odd. He then said yes.

7 And on redirect, the prosecution asked, Did you  
8 record all the calls?

9 All but one.

10 Could have been more?

11 Nope, just one.

12 They gave her a chance. And do you remember I  
13 ended my cross-examination with that one very question?  
14 Because I knew the answer.

15 17 non-recorded phone calls. This does not  
16 include any phone calls that were less than a minute. 17  
17 non-recorded phone calls in February and March of 2020.

18 Lies. She lied to me.

19 Would you say you guys talked a lot on the phone  
20 in 2015?

21 No. If he'd text, I'd text back.

22 Did you guys ever talk on the phone?

23 I'd say maybe.

24 We confront her with the 40 hours of phone  
25 calls. What was the excuse that she gave? I let her talk.

1 I was like a baby deer learning to walk in a  
2 way.

3 She lies, she pivots, she adjusts. She tells  
4 whatever story in the moment that she needs to tell to benefit  
5 Casi.

6 Isolation. Remember this one?

7 I wasn't allowed to talk to anybody.

8 Bill and Joe isolated you; is that right?

9 Yes.

10 Then I brought out the box -- thousands of pages  
11 of text messages, and I threw them on here -- because I have a  
12 flair for the dramatic -- and I went through them. Hundreds  
13 and hundreds of pages at a time. She then concedes, Well, I  
14 wasn't really isolated. It was more like house arrest. I  
15 wasn't allowed to go out and communicate with people and be who  
16 I am.

17 This is when she was on the Hood County  
18 probation. She lied about being isolated.

19 Another fun part. My frustration in this entire  
20 case is that the agents who investigated it never asked her any  
21 follow-up questions. Ever. And so the first time that she was  
22 ever asked these follow-up questions, her story starts to  
23 crumble. Time and time and time again. I reluctantly made up  
24 a list of my assets. The list of assets that Joe and Bill made  
25 me turn over, I had to type it all up.

1                   This list? Are you talking about the one from  
2 Andrew Ottaway's office?

3                   Yep. He had it there at his office. It was at  
4 his office. Yes, my grandmother did this.

5                   They didn't make her compile a list of assets.  
6 And they didn't make her move any of those assets into their  
7 names. It was a lie. Because it sounds good to the agents  
8 that she was telling at the time.

9                   But when you are forced with the truth, again,  
10 another lie. She lied to y'all.

11                   Y'all weren't in a relationship in 2015?

12                   Right.

13                   You weren't in a relationship in 2016?

14                   Correct.

15                   No relationship at all?

16                   We were not in a common relationship, or what I  
17 would call a relationship.

18                   We know that's a lie. I asked specifically.  
19 Again, I knew that Kelsey Adams was coming as a witness. And  
20 she very clearly remembers that she went to Daltille and Floor &  
21 Decor with Bill Stone and Casi Thompson, and they went to Gas  
22 Monkey Garage for lunch in Bill Stone's Tacoma.

23                   I asked Casi that question: You didn't go with  
24 Bill?

25                   I specifically remember being with the designer

1 myself; just her and I.

2 Kelsey Adams is on the stand. We went to  
3 several in D/FW, but the primary one was Daltile.

4 Who was at that meeting? Was it Bill or Casi or  
5 both?

6 Both of them.

7 Because if she concedes to you that they were  
8 there, picking out stuff for their house, that's not good for  
9 Casi. And so Casi, on the stand in front of you, is willing to  
10 lie. Because she knows that that hurts her story.

11 2016: Did you ever hold yourself out as engaged  
12 to Bill Stone?

13 No.

14 Hand on the Bible, swear to God, 100 percent  
15 certainty?

16 I would never say I was engaged to Bill Stone in  
17 2016.

18 Kelsey Adams says different. You want to talk  
19 about someone that doesn't have a dog in the fight? That is  
20 Kelsey Adams. No contact with either one of them since. Not a  
21 lifelong friend of Casi Thompson's. Not a lifelong friend of  
22 the mom. Kelsey Adams. Some random interior designer that we  
23 found in our investigation, seven years after the fact, told  
24 you the truth.

25 With this remodel, this was not your intention

1 to live in this home?

2 Nope.

3 Last thing that she lied about. The IUD.

4 Did you remove your birth control that you had  
5 at the time?

6 Because she left the impression that there was  
7 just kind of this brief moment of conversation that her and  
8 Bill were having a baby together. And so luckily we have the  
9 record and other things to point to.

10 I have not been on birth control.

11 In 2020, didn't you tell this dude Royce that  
12 you and your last boyfriend, Bill, were considering having  
13 another baby, right?

14 Yes.

15 Got Bill's planner here. The government wants  
16 to use it all day, every day; so I will, too.

17 July 21st, 2018. Sex project. No IUD.

18 And let me be very clear about this. I can,  
19 with 100 percent certainty, tell you that Bill Stone never, in  
20 his wildest imaginations, thought this planner would be read  
21 aloud in a courtroom. This is his diary. Or maybe what men  
22 would call a journal. This is embarrassing as heck for him.

23 What he put down about the times that they  
24 engaged in intercourse is what Bill Stone's prerogative is for  
25 his journal, for his planner, for his whatever this is. Okay?

1 Don't act like -- don't believe the government, where it's  
2 like, we knew this was going to be brought into the courtroom  
3 one day. I can promise you he didn't assure that was going to  
4 happen.

5 Then -- so that was July 2018. Here's the text  
6 message in evidence, Stone's Exhibit 159. January 21st, 2019,  
7 Casi is sending a text to Bill saying, February 5th, 6th and  
8 7th are pregnancy days.

9 She continues to lie. Because if she tells the  
10 truth, that will be bad for the story that she's concocted in  
11 this case.

12 What I was very disappointed in was the  
13 government's lies. Lies, lies and more lies. And I almost  
14 said it in my opening, the government's lies. But I held back.  
15 Because I think when the government becomes an advocate and not  
16 a truth-teller, we should all be very, very, very scared.

17 And I sat right here, right next to the lectern,  
18 when Casi was asked questions on direct examination for two  
19 full days. And with the specs on my face, every once in a  
20 while I could lean up and I could see how many pages were left  
21 in the outline. And I know that Ms. Rudoff had an outline that  
22 was about 60-something pages. 60-something pages that Casi  
23 Thompson conceded they had gone through before, with  
24 carefully-manicured questions to hide the truth from you.

25 Don't believe me? Let's go through it.

1                   Casi, about how much roughly do you make per  
2 year as a stylist?

3                   It varies. Probably 65,000. It can be anywhere  
4 from 35 to 65; it just depends on the year.

5                   Now, here is the trick, here's the gotcha.

6                   Other than the income you bring in, does anyone  
7 else help support you financially?

8                   Where's the advocacy in that? All encompassing,  
9 other than the income you bring in, does anyone else help  
10 support you financially? They are leaving with you an  
11 impression that Casi makes 35,000 a year so you feel bad for  
12 her. But they know dang well, just as much as I do, that she  
13 gets the \$6,000 a month ranch payment, she gets her rental  
14 income. These are the games that the government is playing.  
15 They're not telling you the truth.

16                   There's more examples.

17                   When being asked on direct examination again by  
18 the government: Do you recall going to the Mercedes dealership  
19 in 2016?

20                   Yes. He called me one day in the morning and  
21 said meet me at the Mercedes dealership.

22                   What happened? Oh, sorry. Got ahead of myself.  
23 We know what happened. They left that day with a Mercedes  
24 together. They were at the dealership together to get  
25 Mercedes. They're playing games. They are hiding the truth



1 from you.

2                   Nowhere in the direct examination did the  
3 prosecution ever get out the fact that Casi bought a Mercedes  
4 that same day. It wasn't until I asked her the question on  
5 cross-examination.

6                   Here is another trick: Did you give him the  
7 Lexus? Did you then have to get a new vehicle?

8                   I then had my grandmother's vehicle that I  
9 drove.

10                  It's a lie. It's a lie. Casi had two Lexuses.  
11 She traded one in, got her new Lexus; and then gave the older  
12 Lexus to Bill Stone.

13                  And I asked her, You gave Bill a Lexus right  
14 after that, didn't you?

15                  Yes.

16                  You were well within your power to trade in both  
17 Lexuses if you wanted, right?

18                  Yes.

19                  Totally different story.

20                  This is my favorite one. If you are paying  
21 attention to the words that are being said, Casi Thompson and  
22 the government are not saying the same thing.

23                  Bill said to resolve the issue with the Green  
24 Dot card, the Green Dot Mastercard, that he would have to fly  
25 directly to them, hand them a check and pay restitution for me

1 and my boyfriend at the time. Because if he had to get me off,  
2 then he had to get him off.

3 Ms. Rudoff then says: Okay. I want to make  
4 sure I'm understanding your sentence. So Bill Stone tells you  
5 there is a possible resolution to the situation with  
6 Enterprise?

7 She doesn't say Enterprise. She says Green Dot  
8 Mastercard. And she said it all the way through her  
9 examination.

10 They are forcing this Enterprise issue so much  
11 so that they brought someone from Enterprise down. Flew him  
12 down here, got him a hotel; put him on the witness stand to  
13 say, what we all know, is that there was no restitution issue  
14 with Enterprise.

15 The restitution issue with Enterprise was  
16 handled the day that Casi got that car and drove off. When she  
17 called and talked to corporate. The Enterprise story was  
18 mentioned the first time by Joseph DeLeon on a recorded call.  
19 And he said he thought it was 4- or \$5,000.

20 Now, here's the crazy part. We've spent so much  
21 dang time talking about this restitution. You want to know  
22 something crazy? It's not even in the charges. It's not in  
23 Count 2; it's not in Count 3; it's not in Count 4. And I could  
24 keep going.

25 It's not in the counts, but we spent all this

1 time talking about it. Because again, if you get mad about the  
2 250,000, then surely you'll convict Bill Stone.

3 Let's talk about the counts. Count 1, I told  
4 you in the beginning of this trial that I thought the evidence  
5 would show that Joseph DeLeon did not know that the probation  
6 was fake. That's what I said. And much to my surprise, in the  
7 government's closing, they said the same thing. Now, I've been  
8 doing this for a while, and every time that the government  
9 starts their presentation off by saying these are the things we  
10 don't have to prove, that means that we're wreaking some damage  
11 on their case.

12 Count 1, conspiracy, that means two people had  
13 an agreement to commit a criminal act. And because I don't  
14 have the opportunity to talk to Casi, because I didn't get a  
15 chance to do a deposition of her, I heard a lot of stuff from  
16 the stand that I'd never heard before.

17 This is one of them: Stone was pretending that  
18 he was in Washington when actually he and Casi were in -- says  
19 Key Largo, but when they were in Key West together.

20 And so here is a very important part. Something  
21 that I think has been glossed over. Bill Stone and Casi  
22 Thompson hid their relationship from Joseph DeLeon. He didn't  
23 know. He didn't know that they were in a relationship  
24 together. And I think all of the text messages about Bill  
25 saying, your fiancée, your fiancée, your fiancée, I think

1 that's because Bill was embarrassed to be falling in love with  
2 Casi Thompson. A woman who had all of these issues. A woman  
3 that Joseph DeLeon said, I would never marry in a million  
4 years. But Bill Stone started to fall for her. He was  
5 embarrassed. He didn't mention their relationship, but nor did  
6 Casi.

7 Conspiracy requires the agreement of two people.  
8 Because there was no agreement on the super-secret probation  
9 between Bill and Joe, it should be not guilty on both.

10 Okay. And this is a question I asked Ranger  
11 Briley. I said, Fair to say that there were secrets being  
12 hidden from everybody?

13 Counts 2 and 4, I'm lumping these together.  
14 Before I came into this trial, my thought -- and I think the  
15 evidence supports this as well -- was that the cash was being  
16 paid -- not all of it, not all of that -- was being paid to  
17 Bill Stone to help Casi as an investigator. Just like she did  
18 with Charles Tangney in the years before. That was my thought.  
19 But after listening to the way that the government presented  
20 this case, I'm truly more confused now than ever. Let me  
21 explain.

22 Testimony on direct examination, day one,  
23 June 3rd, which is Count 2 of the indictment: Why did you make  
24 a \$9,000 cash withdrawal on that date?

25 Casi: I'm not 100 percent sure. I'm not sure.

1 This is her case.

2 Day two: Why were you withdrawing cash; what  
3 was it typically for?

4 For either Bill and Joe.

5 So now they've taken this position that all cash  
6 withdrawals are for Bill and Joe, right? So that's the  
7 position we're in. All cash withdrawals are for Bill and Joe.  
8 Just accept it as true. Casi can't remember what it is, but  
9 she just knows the only reason she took out cash was for Bill  
10 and Joe. There is a couple problems with that.

11 One, she had five bank accounts in another  
12 institution that we know nothing about. And two, it's not  
13 true.

14 Because then this ring. Oh, my God, the ring.  
15 No one can remember this ring. The conversation with Casi  
16 happened a month ago about the ring and how much was paid for  
17 it, but yet no one can recall it.

18 How much was this cash withdrawal for the ring?  
19 You have no idea? Was it 5,000?

20 The ring?

21 Yes, ma'am.

22 No, it was not.

23 Was it the \$9,000 cash withdrawal?

24 It could have been. I don't know, it could have  
25 been.

1 All right. So now we've gone from a position of  
2 every single cash withdrawal that I have is for Bill and Joe,  
3 to now, well, there is a ring that I've purchased. That's  
4 doubt. That's confusion. And that is what I'm talking about.

5 Here are some more clips.

6 I'm not sure. Maybe 8,000. That's a ballpark.

7 This is the one we just went over: Could have  
8 been the \$9,000 cash withdrawal.

9 When Ms. Rudoff asked: How much did you pay  
10 Bill Stone for that ring in particular?

11 \$7,490.

12 All over the place.

13 This is the last thing that the government's  
14 done -- they did it the again in their closing -- that is  
15 confusing me about the cash. There is 100 percent a cash  
16 withdrawal from Casi Thompson in the indictment date of  
17 June 24th, and yet now they're asking you to consider the one  
18 on May 25th. Why? I don't know.

19 Count 3. They didn't tell you the whole story.  
20 Bill and Joe [sic] went to the Mercedes dealership together.  
21 They left with a Mercedes together. That's not fraud.

22 Count 5. Count 5 is the \$24,000 cash payment --  
23 I'm sorry -- cashier's check to the Tacoma dealership, okay? I  
24 asked Casi on cross-examination: She, being Myrna, bought you  
25 like three houses and like six cars. You don't think that's

1 getting spoiled?

2 If that is what you want to call it.

3 Two things to point out here. It is not a  
4 similarity or a coincidence that Myrna Thompson would buy Casi  
5 cars and houses. As I said in my opening, it's the Thompson  
6 love language. And so what does she do and for the person that  
7 she's in a relationship with? Cars, and helps buy the house.

8 Count 6. Why 154,500? If the intent of this  
9 scheme was to steal as much money from Casi Thompson as  
10 possible, why in the heck a random amount of \$154,500? I'll  
11 tell you. Because when Bill took into consideration the  
12 \$230,000 restitution he paid his wife, that 20,000 extra went  
13 to her half of their house. And Slayter was going to live  
14 there, too.

15 Count 8. I think Count 8 is encompassed by  
16 Count 6 in the sense where we'll go through the charge in a  
17 second. But ultimately when you guys find that that house was  
18 bought for Casi and Bill, there's nothing to do on Count 8  
19 other than to find Bill Stone not guilty.

20 Penny Weisand. So I pressed her on the badge.  
21 And I did that for a reason. Because I had reason to believe  
22 he never flashed a badge. And here's why we know that that's  
23 true.

24 Was there any metal, the badge part?

25 It was a brass gold type.

1 I was annoying, I was persistent and I asked  
2 that question for a reason. Because he doesn't have a brass  
3 badge.

4 Darla Bell freaked out on the stand. And I  
5 don't blame her. I asked her -- I read from the elements of  
6 impersonating a federal official. Darla Bell falsely assumed  
7 and pretended to be an officer, a DEA agent.

8 Did you do that?

9 I did.

10 Check.

11 While acting in such an assumed and pretended  
12 character, Darla Bell demanded and obtained money and things of  
13 other value.

14 Did you do that?

15 No.

16 That's why she wasn't charged. That's why she  
17 wasn't indicted. That's why she didn't have any cooperation  
18 agreement with the government. That's why she didn't need a  
19 criminal defense attorney.

20 The government is very able and clearly able to  
21 see that there are times where someone can pretend to be an  
22 agent and not be holding themselves out with the intent to  
23 defraud somebody.

24 And need I point out that every time that Casi  
25 was asked in any sort of recorded call with the agents, she



1 always said that Bill was a CIA agent, not FBI. Bill Stone's  
2 been charged with impersonating an FBI agent.

3 Again, follow-up, Darla Bell: You had no  
4 intention of getting money, no intention of getting property,  
5 correct?

6 Correct.

7 Count 1: Defendant and at least one other  
8 person, not guilty. Bill Stone and Joseph DeLeon, they did not  
9 have an agreement together.

10 Counts 2 through 7, here are the points that I  
11 want you to focus on. The same points that I asked you to  
12 focus on in opening. Did he do it with the intent to defraud  
13 C.T. and obtain money, and did he act with the specific intent  
14 to defraud?

15 That's what I'm asking you to decide.  
16 Throughout this whole trial, I've agreed to so many bad facts  
17 for us. But at the end of the day you need to again decide if  
18 that was what Bill Stone's intent was at the time.

19 Count 8, specified unlawful activity; namely,  
20 wire fraud. Again, it all follows the same language. Did he  
21 intend to deprive Casi of money and property?

22 Second thing, or second element, Count 9, the  
23 defendant demanded and obtained money and other things of  
24 value.

25 In every single count, worded differently, is

1 the same question. Did he do it to obtain money and property  
2 from Casi? That's the question that you have in Counts 2  
3 through 9. That single question.

4 There's a caution charge in there. Defendants  
5 are not on trial for any act, conduct or offense not alleged in  
6 the superseding indictment. Okay? By referencing that, I'm  
7 talking about the \$250,000.

8 Jury selection. Seems like a month ago at this  
9 point. All not guilty people are not guilty. I'm not asking  
10 you to find Bill Stone innocent. We had that whole  
11 conversation. Went up and down the list. Innocent: Probably  
12 not, maybe, I suspect, possibly, likely. They must get beyond  
13 all reasonable doubt.

14 Now, if I'm sitting where you are, I'm telling  
15 myself two things. That I hate Bill Stone, and that you  
16 probably never would have taken that money. I get it. That's  
17 not a proper analysis on this case.

18 The law requires you to consider the facts of  
19 this case. And so what I'm asking you is, this probation went  
20 from the 2015 all the way to 2019. Not a single dime was  
21 exchanged in 2017, 2018, 2019, 2020. Why keep up the fake  
22 probation if the intent of the probation is not to get as much  
23 money from Casi Thompson as possible? Why stop? If it's  
24 working, why stop?

25 Why did Bill Stone pay for the Tacoma the next

1 year? Just have Casi do it. It's because the intent to  
2 defraud wasn't there. It doesn't matter what you would do in  
3 that situation. The question is, was it Bill Stone's intent to  
4 deceive her and to take money and property from her.

5 Before I sit down, I want us all to imagine  
6 something. Imagine that we're Casi Thompson in the summer of  
7 2019, and she just found out that this fake probation was fake.  
8 Imagine if when she sat down with Ranger Briley, instead of  
9 telling the story that she told, she told the truth.

10 Ranger Briley, in 2015, I got out of rehab.  
11 There were only a few people in my life that I could lean on at  
12 that time. Bill Stone and Joseph DeLeon. And somewhere along  
13 the lines, Bill Stone and I, we hatched a romantic  
14 relationship. And we dated all the way throughout 2015. In  
15 fact, when Mimi fell at the end of July, he's one of the people  
16 I called.

17 We talked and talked and talked. And when he  
18 could, when he could fly in from D.C., we would see each other.  
19 And that relationship grew and grew and grew. But then  
20 something weird happened at the end of 2015. Bill and Joe sat  
21 me down and Bill said, you are on this super-secret federal  
22 probation, and here are the terms: Do well in school, write  
23 down your daily activities, take care of your kids and make  
24 sure you handle your actual probation-related matters.

25 Well, that's weird. Tell me more about that.

1 Well, Bill Stone, he had retired from the FBI at  
2 that point, but he was still doing some CIA work. But I don't  
3 know, the whole thing was just really weird.

4 So what did he make you do?

5 Well, I had to tell him every single day what I  
6 was doing.

7 Were you guys still dating during this time?

8 Yeah, we were. In fact, in February of 2016, I  
9 bought us Rolexes. It was a little Valentine's Day gift. And  
10 then a month later, this is right before my grandma's estate  
11 was cashed in, I came into a lot of money. And unfortunately I  
12 didn't manage it all that well.

13 COURT CLERK: Five minutes.

14 MR. GALLIAN: And so I started spending and  
15 spending. But I spent money on the people that I cared about.  
16 And so I bought myself a Lexus. I then gave Bill, my boyfriend  
17 at the time, a Lexus so that he and I would have matching  
18 Lexuses.

19 A couple months later I'm still on this  
20 probation. He's still wanting me to tell him on a daily basis  
21 what I'm doing. But then we go into a Mercedes dealership and  
22 we get our matching cars. And then a couple months go by, and  
23 you know what? Bill and I decide we're going to take the next  
24 step in this relationship. We're going to move in together and  
25 we're going to buy a house.

1                   And so I paid half of our house. And over the  
2 next three months, Bill and I remodeled that house together,  
3 where we were going to live as a family.

4                   It was an odd relationship, because Bill Stone's  
5 much older than I am. But I care for him. He clearly cared  
6 about me. He had my best interest at heart. And so our  
7 relationship continued.

8                   All the way until she finally concedes it, in  
9 2017.

10                  But our relationship goes and goes, and now  
11 we're starting to take trips together. And I enjoy these trips  
12 together so much that I buy us bags, his and her bags. And  
13 then at the end, the very end of our relationship, a lot of  
14 very weird stuff started happening.

15                  I got a fake call from a judge, which has never  
16 happened before. I got a fake DEA phone call, which has never  
17 happened before. All these friends that I thought I had  
18 started dying off. And I realized that everything he'd been  
19 telling me about this federal probation was fake.

20                  If Casi sat down with Ranger Briley and told  
21 that story, would any of us be here?

22                  Thank you.

23                  THE COURT: All right, members of the jury, do  
24 we want to take a quick stretch break or keep going?

25                  Are y'all ready?

1 (Respond affirmatively.)

2 MR. SELLERS: If I could have just one minute?

3 THE COURT: Certainly.

4 (Brief pause.)

5 MR. SELLERS: Good afternoon. During  
6 deliberations, you'll have three jobs. The first of those is  
7 to decide how you feel about the issues in this case. The  
8 second is to follow the law. No juror has a right to ask you  
9 to step outside of the law. That's just not allowed. And you  
10 are duty-bound to let the Court know if one juror asks another  
11 to do that, whether you are involved or not. The third is to  
12 explain how you feel about what you've heard in this case. And  
13 I hope to give you some ideas about how to do that through my  
14 presentation now.

15 Remember back at the very beginning of this case  
16 the judge said a common thing that we hear in these courtrooms;  
17 and that is, you do the accusing, you do the proving. Do y'all  
18 remember hearing that?

19 Well, that's exactly how it works. And this is  
20 the indictment that they chose. We had no involvement in this.  
21 We never believed we would have been indicted after cooperating  
22 for so long like we did. But here's what's important. Rudoff  
23 got up here and was playing fast and loose with their  
24 accusations. The truth is, what they put in their indictment  
25 and their accusing document is that DeLeon engaged in a scheme

1 and artifice to defraud and deceive the victim herein  
2 identified by C.T., with false statements, including, one, that  
3 Stone was still an active federal agent; two, that C.T. was  
4 under federal probation, and pursuant thereto was under the  
5 supervision of Stone and DeLeon. They wrote that. And now  
6 they're trying to tell you, we don't have to prove that.

7               Mr. Gallian's exactly right. When they get up  
8 and tell you in opening, we're going to prove this to you, and  
9 then in closing get up and say, you know, we don't have to  
10 prove that; and, in fact, maybe we were wrong about that; it  
11 doesn't matter, that is a red flag. A big one.

12               Because here's the rest of it. At Stone's  
13 direction, C.T. gave DeLeon 50,000 in money and property for  
14 his participation. They knew that from the start. They knew  
15 that. DeLeon's name appears 11 times in this indictment.  
16 Stone's appears 39 times.

17               Had you looked at the evidence in this case, and  
18 what they presented and how they had their stingers out for  
19 Joe DeLeon, you wouldn't know it. You wouldn't know it at all.  
20 And when they stoop to that level, to try to convince you that  
21 he lied, to try to convince you that wearing a wire is not  
22 cooperating. Wearing a wire alone, with somebody that they  
23 were so afraid of when they did a search warrant they took a  
24 tank to his front yard, with 35 officers and a helicopter  
25 flying over. There is only one of two conclusions. They're

1 either just very poor stewards of our taxpayer dollars; or,  
2 number two, they knew Stone was dangerous. And yet they let  
3 DeLeon go in a car with him while wearing a wire in a cigarette  
4 box.

5                   So what does the jury charge say? Well,  
6 remember that scheme or artifice to defraud? There it is.  
7 First, that the defendant knowingly devised or intended a --  
8 devised a scheme to defraud C.T., knowingly intended to involve  
9 themselves in a scheme and artifice to defraud. And what did  
10 they accuse that scheme of being? The probation. Which they  
11 now say -- almost admit that Joe didn't even know. So now  
12 they've told you. They've told you. I don't know who else has  
13 to tell you Joe did not know.

14                   So what are the reasonable doubts in this case?  
15 Straight from the jury charge. First, maybe Joe believed the  
16 fake probation was real. Without abandoning logic and reason,  
17 if you can believe that Joe thought maybe that probation was  
18 real, he didn't know about the scheme or artifice to defraud.  
19 Maybe Joe believed that Bill was still a federal agent. Which  
20 means if he believes that, he also is way more likely to  
21 believe that fake probation was real. And three, maybe Casi  
22 gifted Joe the F-150 and the \$15,000, okay?

23                   Let's talk about that for a minute. They have  
24 to prove those things beyond a reasonable doubt, right? And  
25 I'll tell you, we talked in the jury selection about that green



1 bar there, a preponderance of the evidence. This case belongs  
2 in civil Court. This is a case about money. She wants her  
3 money back. She should sue them in civil court. And she still  
4 can do that. But instead she's done this. This is different.  
5 These are federal crimes. That is a federal judge. This is  
6 way different.

7 But thankfully we have these burdens of proof.  
8 And even if you have a firm belief, but still have reasonable  
9 doubt about whether Joe believed that probation was real, Joe  
10 is not guilty. And they have to rule out all the other  
11 logical, reasonable possibilities.

12 They don't get to tell you -- and we've seen it  
13 time and time and time again. They don't get to give you just  
14 one version of the facts, one version of how they think this  
15 all played out, while either ignoring other facts completely or  
16 just acting like they don't exist. They don't get to do that  
17 when other logical, reasonable explanations exist for what  
18 really happened. Because we're all innocent unless this table  
19 produces the witnesses, the testimony and the evidence beyond  
20 any reasonable doubt to convict Joe DeLeon.

21 What they've been asking you to do this whole  
22 time is jump to conclusions. And what happens when you do  
23 that? It can be wrong. It can have lifelong effects on  
24 Joe DeLeon.

25 Let's talk about the believability of the

1 witnesses. I want to go back to the scheme part real quick.  
2 If there is another scheme or artifice to defraud that they  
3 didn't put in their indictment, make her answer that question  
4 when she gets up. What is the scheme? What is the scheme  
5 then? What is the -- the method by which they were doing this  
6 conspiracy? What is the -- the way that they devised this  
7 plan? Because what you said in your indictment was it was the  
8 fake probation, and now apparently it is something else. So  
9 make her answer that.

10 Believability of witnesses. That's your job.  
11 That is your job as jurors. There is nobody who can tell you  
12 who to believe and who not to believe. That is exclusively  
13 within your job description. And you can believe some, all or  
14 none of what any witness has to say.

15 Remember back in opening I talked to you -- or  
16 jury selection, I guess, now, I talked to you about how to tell  
17 whether a witness is being truthful or credible with you or  
18 not? And the best definition I've ever heard is, is the  
19 witness trying to help you learn the facts or trying to get in  
20 your way from learning the facts.

21 And we saw it time and time and time again. Let  
22 me give you some examples. Ms. Thompson, for example, why did  
23 Grandma -- questioned by Ms. Rudoff: Why did Grandma take Mom  
24 and cut her out of the will?

25 Do I have to answer that?

1 And then she just goes on to another question.

2 We know why. Casi went and batted her pretty  
3 little eyes at Grandma while she was on her way out and got her  
4 to change that will. The facts support it. The timeline  
5 supports it. Changed that will to cut her mom and her brother  
6 out. And naturally, like anyone who does a family member like  
7 that, she was scared. She was truly scared of her mother and  
8 her brother at that time.

9 And that is not -- I mean, that is supported by  
10 the text messages. Remember the question I asked about, Did  
11 you -- do you remember when you backed your car into Joe's  
12 Mercedes?

13 No. No, no. That 1,000 percent didn't happen.  
14 What do we see in the text messages? That  
15 apparently did happen.

16 The -- Mr. Gallian already covered the IUD  
17 thing. I mean, we're all adults here. We know how an IUD gets  
18 there and we know how it gets out. You don't forget that. You  
19 simply don't forget that. That oath either means something to  
20 you or it doesn't. And apparently it doesn't.

21 And that -- her word. None of these people that  
22 testified after her; none of these government agents, none of  
23 these Texas Rangers can supplant what they believe or what they  
24 want you to believe for what she said on that witness stand.

25 If you follow the law, the sworn testimony from

1 her on that witness stand, you can't rule out the possibility  
2 that Casi is just not credible. And either she doesn't  
3 remember or she doesn't care. And I'm not sure which it is.

4 The funeral invite: Joe had to escort me to my  
5 grandmother's funeral.

6 Then you look back at the texts between Joe and  
7 Casi from like 2005 on. And let me address something. She  
8 told you in her open -- close that Joe deleted text messages.  
9 That never happened. Every single text message you saw was  
10 from Joe DeLeon's phone, because he had nothing to hide.  
11 Joe DeLeon did not delete messages. Bill Stone did. Casi  
12 Thompson did. But not Joe DeLeon.

13 Oh, and then there was this one. I asked her on  
14 cross-examination on Friday: Do you remember the badge? You  
15 see this badge before?

16 Nope, it wasn't that one. It wasn't that one.

17 And then we go for the weekend and Ms. Rudoff  
18 has her back on redirect. I guess they didn't put this in  
19 their script. But she asked her: And this isn't the badge,  
20 was it?

21 I'd like to change my testimony on that.

22 Do you remember when she said that?

23 I'd like to change my testimony on that. I take  
24 that back. That was the badge I saw.

25 Because they've been trying to convince you

1 since the start that Joe DeLeon's affiliation with the Fort  
2 Worth PD was all smoke and mirrors. I think we all know that  
3 that's not true now. He truly was affiliated and supportive  
4 and loved his law enforcement community. Obsessed with it,  
5 even.

6 Andrew Latham. Poor guy. You know, and this is  
7 a recurring theme. You'd see them over here and you heard me  
8 sitting over here objecting, leading; leading; leading.

9 Well, remember when she was leading him into  
10 this thing about the F-150 truck yesterday -- or two days ago?  
11 And she's asking him: Does it say anywhere that the F-150  
12 truck was hit? And he's like, I didn't say that. I didn't say  
13 that.

14 Well, luckily they've been buying the  
15 transcripts, and Gregg says, hey, look at this.

16 So based on your review of the evidence -- this  
17 is back two days ago now in your -- DeLeon's interview with  
18 Ranger Briley on September 5th -- if he told Ranger Briley that  
19 he ended up having to sell the F-150 truck that Casi  
20 transferred to him, because Casi backed into the truck and  
21 caused damage, would that be true? It's like they're either  
22 just learning the case or they don't care about what the truth  
23 is. And that is dangerous.

24 The power they have is an awesome power. And  
25 they're supposed to wear the white hat. And they are supposed

1 to do the right thing. And they are not supposed to lie to  
2 you. They are not supposed to try to get witnesses to tell a  
3 story that supports their case. But that is what we've seen  
4 over and over and over again for three weeks.

5           The failure of a party to produce a witness  
6 within the party's power creates an inference that his  
7 testimony would be unfavorable. So where is senior Special  
8 Agent Brian Luley? He's been here every single day. He's  
9 walked by you every day. When you're in line for security, he  
10 walks by. He's been in the courtroom. They spent 30 hours on  
11 their case. They didn't think -- Ms. Max went to great lengths  
12 to say, hey, Ranger Briley, you weren't the lead person on this  
13 case, were you?

14           The lead investigator? No, that was Luley.

15           So where is Luley? Can you imagine sitting in a  
16 case and not hearing from the lead detective? What did they  
17 not want you to hear? What did they not want you to hear? Was  
18 it because they were going to hear the rest of Joe's  
19 cooperation through him? Because he controlled it after that.  
20 They didn't want you to hear how Joe really did cooperate?  
21 Hear more of Joe's true, genuine conversations, where he's  
22 trying to help them make a case, because that is what Joe is  
23 like? No.

24           No. They don't want that. They don't care  
25 about the truth. A predator knows what its prey looks like. A

1 predator knows what its prey looks look. A predator knows a  
2 wounded deer learning to walk again. A predator knows who the  
3 weakest links are. A predator knows how to exploit people's  
4 weaknesses.

5 For Casi, her drug addiction. Fear of losing  
6 her children. Fear of going to prison. For Joe, his love of  
7 law enforcement. His reverence for those who are in the law  
8 enforcement community. His health. You'll hear in just a  
9 minute, exploited his health. Darla Bell, exploited her  
10 Christianity. Exploited her fear of somebody dying.

11 (Audio playing.)

12 MR. SELLERS: Ranger Briley said it best: Joe  
13 was the weaker vessel of the two. No doubt. He was prey. He  
14 was somebody that Bill used because Bill Stone is a user. Been  
15 that way his entire life.

16 What does Casi say about Joe? He was a sheep.  
17 He idolized Bill. He would do anything Bill said. He was a  
18 puppet. What does a puppet need? A master. And Bill was that  
19 master.

20 And they know what prey looks like, too. They  
21 know when they've got one. They know who is not prey. They  
22 know who not to go to. Because you've got to sit and ask  
23 yourself, Darla Bell has a Master's degree. She has a good  
24 job; lives in a nice house, and yet she fell for Bill Stone's  
25 stuff. A Master's degree. Joe was high school educated in

1 Mexico. And they've been over here trying to convince you he's  
2 some sort of genius. High school educated in Mexico.

3 And then put -- combine his 20 years at that  
4 point of helping the police and loving the law enforcement  
5 community, and there you have the perfect recipe for Bill to  
6 prey upon. And he did.

7 And you know, trust takes time. This wasn't  
8 something that just happened, you know, in 2015. They worked a  
9 human trafficking case together in 2003 that Joe reported. Joe  
10 helped the FBI. Helped Bill Stone put together a human  
11 trafficking case that they know about. It was tried in federal  
12 court in Fort Worth. This is not some sham relationship. Joe  
13 truly trusted Bill. And Bill manipulated that trust and  
14 exploited his vulnerabilities, and used it to his advantage.

15 Listen here. Ask yourself, does this sound like  
16 Casi and Joe are in the same boat or whether Bill and Joe are  
17 in the same boat? Listen here.

18 (Audio playing.)

19 MR. SELLERS: You are a federal agent. He was a  
20 federal agent. The reason Joe trusted him. The reason Casi  
21 trusted him. Why is Joe not entitled to that same level of  
22 trust that Casi is because of his status as a federal agent?  
23 There is no evidence from which you can conclude that Joe did  
24 not just totally believe his puppet master that he was still a  
25 federal agent.



1                   So how about betrayal? What do you do to betray  
2 somebody? You gather information. You learn their weaknesses.  
3 You exploit them. Casi's weight, her addiction, her love of  
4 her children. Joe's love of law enforcement, his health.  
5 Darla Bell -- you may think these people are just stupid. And  
6 that's fine.

7                   And, Joe, I'll tell you, you were stupid at  
8 times.

9                   But stupid is not guilty. That's it. Stupid is  
10 not guilty. And don't let them try to convince you because Joe  
11 was able to run a taco shop that he's some kind of genius.  
12 That is just ludicrous.

13                  You can save a life tonight. I know you're a  
14 Christian woman.

15                  Manipulated and exploited her Christian faith  
16 and caused real pain. You saw it for yourself. Those were  
17 genuine tears. Those words you just heard from Joe were  
18 genuine shock and surprise. He had no idea. Why? Because  
19 they weren't allowed to tell him. They didn't tell him.  
20 Whether Bill was embarrassed or whatever the reason, he told  
21 Casi, don't tell Joe. And that's exactly what she did. She  
22 didn't tell him.

23                  So maybe they can't rule out the possibility Joe  
24 believed that Bill was still a federal agent. Never thought  
25 that my mom making me read Mark Twain in elementary school

1 would come in so useful these days. But I mean some of these  
2 things just ring true. It's harder -- it's easier to fool  
3 people than to convince them they have been fooled.

4 (Audio playing.)

5 MR. SELLERS: Three hours. Three hours it took,  
6 Briley told you, to convince Joe the probation wasn't real and  
7 Bill was not an agent. Here's the best evidence, though; Casi  
8 herself.

9 Casi, I asked you at the beginning, I'm going to  
10 ask you now at the end, can you rule out the possibility that  
11 Joe also believed Bill was an FBI agent?

12 What was her answer? I'm on the fence about  
13 that. That means she's not sure. And you know what not sure  
14 means? Not guilty.

15 Those are reasonable doubts. She spent so much  
16 time with him. She knows -- or should know, and even she's not  
17 sure. If she's not sure, you can't be sure.

18 We don't have photo finishes in criminal law.  
19 We don't guess people into the penitentiary. We just don't do  
20 that. Maybe Joe believed the fake probation was real. And I'm  
21 going to go back to the meeting with Briley there.

22 Remember when Mr. Westfall was cross-examining  
23 Briley and he went and showed him that e-mail from April of  
24 2020? The e-mail where he says that it appears that Stone has  
25 deceived both DeLeon and Thompson, and appears that DeLeon and

1 Thompson are victims?

2                   Where is Luley? The person who apparently  
3 decided to overrule Briley on that issue? So Ranger Briley  
4 himself was at least partially convinced that Joe shouldn't be  
5 in the hot seat. And then Mr. Luley decides that ought to be  
6 different, or they decide together collectively as a  
7 prosecution team that that should be different. And then they  
8 don't call the person who might know the reason why as a  
9 witness.

10                   You've got to make yourself -- you've got to  
11 think about that. What are they trying to hide from you? Even  
12 to Casi it appeared that her and Joe were in the same position.  
13 And, you know, how could one not believe it?

14                   And they keep -- see how they did yesterday with  
15 these character witnesses? What if Joe, you know, told someone  
16 he was a probation officer?

17                   That didn't happen. That didn't happen ever.  
18 He was her mentor. It was what Bill said to him. You will be  
19 her mentor. Can you help your project? Can you help this girl  
20 stay off of drugs, stay out of jail and with her children? And  
21 to Joe, who would help anyone, even if it hurt him -- and it  
22 did. It caused him to lose his restaurant helping her so much.

23                   And this -- this BS about 60 days, 60 days, no.  
24 She told you herself he wasn't out of there until 2017. Stop  
25 letting them -- y'all are smart. Y'all are a smart jury.

1 Don't let them do that to you.

2 I mean, I -- I guess they think you are just  
3 unintelligent. I don't know what they think. But I hope you  
4 see it.

5 Will you be able to monitor? How much more time  
6 can you dedicate on a weekly basis? Monitor more than now.

7 As much as I'm needed.

8 Don't want to interfere with your work. Think  
9 about it carefully.

10 He's working him. This is a predator doing his  
11 thing. Working him just like he worked Darla Bell; just like  
12 he worked Casi Thompson.

13 And what an easy mark Joe was.

14 Is it worth all the time and effort you're  
15 willing to commit?

16 Okay, then I'll pass it on.

17 Who is he passing it on to?

18 And then: Are you still with your fiancée?

19 Well, look at Joe. You know, this guy, if  
20 that's what's best for her son, I'm willing to do it. The  
21 children are our future.

22 That's just who he is.

23 And dutifully answer the call he did. Spending  
24 60, 70, 80 hours a week out there sometimes. And you're like,  
25 oh, Joe is spending the night? That's strange. He was sitting

1 on the back porch brushing her dogs, her three Lassie dogs, her  
2 three collies, helping her day in and day out.

3                   They were friends. And at times, he was her  
4 only friend. And when you treat your friends like that, it is  
5 a wonder you don't have more.

6                   Knowledge of the conspiracy. No knowledge of  
7 the conspiracy beyond a reasonable doubt. No knowledge of  
8 unlawful purpose, highly likely. No knowledge of unlawful  
9 purpose, likely.

10                   You know, maybe you can put Joe somewhere around  
11 here. But anywhere down here, no way. And even if you think  
12 it's highly likely he had knowledge of the unlawful purpose,  
13 he's still not guilty. That's how strong this law is. You  
14 take every inference -- what they're asking you to do is take  
15 every inference in favor of their case. That is not how this  
16 works. You are supposed to take every inference in favor of  
17 the accused. The default verdict is not guilty. And that's  
18 where it stays unless they overcome it.

19                   (Audio playing.)

20                   MR. SELLERS: This is perhaps the most telling.  
21 This is at the end. It's at the end. Remember at the  
22 beginning when Joe threw up when he thought something bad was  
23 happening to Casi? Remember that? When he threw up when Joe  
24 learns about the -- that she's got to be on this secret federal  
25 probation? Listen to this.

1 (Audio playing.)

2 MR. SELLERS: Gotta keep doing her 3x5 cards.  
3 If Joe is in on this, where is the part about, hey, man, you  
4 know this is all a hoax, you know this stuff ain't real; you  
5 know she's not really on this probation; this 3x5 stuff was  
6 just kind of something we made up. You know that. Why is he  
7 continuing to lie to him if he's in on it? Why is he  
8 continuing to lie to him? This is in '19.

9 (Audio playing.)

10 MR. SELLERS: Did y'all hear at the beginning?  
11 Hang on, I've got to pull over so I can throw up. Because he  
12 forgot he was in that conference room. Why is he lying to him?  
13 Why? Last one.

14 (Audio playing.)

15 MR. SELLERS: That call right there is about  
16 50 minutes long, 5-0. It has all the lies you need being told  
17 to Joe by Bill in 2019. The fake probation, the 3x5s that he's  
18 still got to do; Dr. S and Dr. B; the fake calls on the phone.  
19 All of it. Why is he lying to Joe if Joe's in on it? That's  
20 crazy.

21 This is my Bill only list. Remember when I went  
22 through with Casi -- I had three more pages to do with Luley,  
23 but they didn't decide to call him. Said Joe got in trouble  
24 with Fort Worth PD, deleted messages, threatened CPS case;  
25 nicknames for everyone Casi had contact with; tried to change

1 the wills and trust; calm about probation. Not Joe. Joe was  
2 throwing up.

3 Well, you notice, Bill was calm. He was calm.  
4 There was no trauma, she said. But when does Bill throw up?  
5 That was that call that I just played. It was 38.1 at the very  
6 end when he finds out that he's caught. That's when he throws  
7 up. The irony, you know? The irony of it.

8 Dr. B and Dr. S, the trauma, the analysts; the  
9 friends and family; the drugs in the car and having to sell it;  
10 the spoof call. I didn't hear Joe in the spoof calls. I  
11 didn't hear anything about Joe in the spoof call, did y'all?  
12 No. That was Bill only, Bill only, Bill only.

13 And so with that, you got to ask yourself, where  
14 does Joe really follow on this? Doesn't really matter. He  
15 falls in the not guilty zone.

16 And if Joe knew everything -- you got the two  
17 co-conspirators here in the same courtroom on the same  
18 conspiracy. And if Joe was so involved and in on everything,  
19 why is he not charged with the substantive counts of wire  
20 fraud? Even they know. They know because they didn't charge  
21 him with wire fraud. Don't be fooled by the stuff you're  
22 hearing from these folks over here.

23 Three, maybe Casi gifted Joe the F-150 and the  
24 \$15,000. This one's pretty easy. These are from the chart I  
25 had. Casi tells you, I don't believe I ever told Joe I didn't

1 want to give him the F-150.

2 The check. Joe never asked Casi for money;  
3 true. Casi never asked Joe to give the money back; true.

4 The 5,000 cash. Do you remember they talked  
5 about the 5,000 cash and they had the analyst up there? And  
6 Westfall even brought it up. I was just like, don't do that,  
7 man. They're going to come up with some story for it. Even  
8 they disregarded that 5,000 cash. Because during the course of  
9 this trial, they've realized they were wrong themselves. That  
10 is why they didn't ask him the question about it. They left it  
11 on his chart hoping you'll just forget that they didn't ask him  
12 about it.

13 The truck. It's pretty simple. She told OIG in  
14 May of 2020, I gave him the truck. Bill told me to give him  
15 the truck. From her mouth in 2020, before any of this was ever  
16 even a thought in their minds.

17 The text messages. You know, the context, we  
18 had to bring you the context of everything. They'd show you  
19 one text, like, oh, my God, Joe is so bad. But then if you go  
20 look at the days surrounding it, the truth is there.

21 And then, of course: Tell Slayter I said good  
22 night and sweet dreams.

23 A few months later: Did it hail on your truck?

24 No. I got up and moved it underneath --  
25 underneath the -- the bridge.



1                   The truck timeline. You know what, here it is.  
2 There's that text about the -- the car she didn't hit. Not an  
3 F-150. You know what they're trying to do to y'all. I mean,  
4 it's just wild. I've never seen anything like it. They should  
5 be ashamed of themselves.

6                   The car is not even a week old.

7                   Yes, I know. She's kind of beating herself up  
8 about it.

9                   But here's the truth. She gets that \$500,000.  
10 And she's got more money than she's ever had in her whole life,  
11 and she writes Joe a check back. Here's the truth of the  
12 matter. You know, very nice truck. And he's like, give it to  
13 Joe. What happened after that does not matter. And this  
14 argument that they're making about, oh, they had to have a  
15 paper trail; what kind of criminal do you ever know that says  
16 let's make a paper trail. That's crazy.

17                   If they wanted to keep it secret, they would  
18 have never written checks about it. The title office never  
19 asks about that. They could have just written whatever they  
20 wanted in those forms. But they wrote exactly what the puppet  
21 master told them.

22                   Casi gave Joe the truck. She said it herself it  
23 was true. Bill told Casi to give Joe the truck, you know, and  
24 for free, and she never asked him to give it back.

25                   Casi, if you'd have asked him to give it back,

1 he would have done it.

2 She never asked him. And you hear in the four  
3 calls, the controlled calls, she never confronts Joe. She  
4 never confronts him once. Yet with Bill: Bill, why don't you  
5 give my money back? Bill, are you going to sell your house and  
6 give me some of that money back?

7 But she never confronts Joe, because she knows  
8 she gave it to him. And she never asked him to give her the  
9 money, which he would have gladly done. Gladly done it. What  
10 she's really mad about is that he accepted it. You know what,  
11 I guarantee you, looking back, had to do over again, he  
12 wouldn't have. He wouldn't have even thought about it. But  
13 she gave it to him. She was getting rid of her grandma's stuff  
14 right and left.

15 Betrayal. Lied to him about the relationship.  
16 The financial part of it. The sex. The Key West trip. All of  
17 it. Lied. The Nils Hubert -- before they try to hoodwink you  
18 with more lies, so it's not uncommon, Bill told me not to talk  
19 to Nils. Remember that Nils text? And that Nils text back  
20 or -- or Joe calls -- Bill calls Joe immediately for  
21 47 minutes. What does he tell them? You can't trust that guy.  
22 He's going to give you up. He's going to cause you trouble.  
23 Stay away.

24 Building division again from Ranger Briley.  
25 That is what predators do. Build division.

1                   Yeah, but what about that 600,000? Look at  
2 their exhibits. They knew Bill and Joe were talking. In fact,  
3 Ranger Briley told Joe not to act any differently than he did  
4 before. And so of course he knows about that \$600,000, because  
5 what happens when he walks in? First thing he says.

6                   (Audio playing.)

7                   THE COURT: Wrap it up.

8                   MR. SELLERS: Yes, ma'am, I'm wrapping right  
9 now.

10                  First thing he says when they get together in  
11 the house: She's accusing me of stealing \$600,000. Is it  
12 really that far-fetched to believe that if they're talking all  
13 the time that they've had that discussion before? Whenever --  
14 first thing he says when he goes to his house, that he didn't  
15 know was there or where it was until that day, first thing he  
16 says is 600,000? No. Don't let her try to trick you  
17 otherwise.

18                  I'm going to wrap up now.

19                  THE COURT: Wrap up quickly.

20                  MR. SELLERS: Yes, ma'am. If I can get there.

21                  Many of you have never been on a jury before,  
22 but I'd like to suggest your first vote should be by secret  
23 ballot. This prevents the monkey see, monkey do. Do what you  
24 want, but I think that's a good way to start.

25                  Ladies and gentlemen of the jury, it has been an

1 honor to present this case to you. I maybe have lost my temper  
2 at times, but I promised I would speak with peace this week.  
3 And so I'm going to wrap it up now.

4 And for two years, Joe has been our charge.  
5 He's been on our conscious; he's been on our -- he's been the  
6 reason we don't sleep at night. And we hope we've done  
7 everything we can to show you that he truly is just a simple  
8 man who trusted the wrong person. But now he's yours. And I  
9 hope at the end of this you will give him back to us just as  
10 we're giving him to you.

11 Thank you for your time.

12 THE COURT: All right. Members of the jury, you  
13 have now heard all of the -- we have -- I think we have  
14 18 minutes. Do we need a break or are we good? Government  
15 gets the last word. They've reserved some time. I apologize.

16 MS. MAX: No offense taken, Your Honor. No  
17 offense taken.

18 Project and a dollar sign. Project Number 2,  
19 dollar sign. That's what she was to them. But we're supposed  
20 to believe that none of this was about the money.

21 December 18th, 2015, \$5,000. But we're not  
22 supposed to believe this is about the money, ladies and  
23 gentlemen. December 24th, \$5,000. I guess it wasn't about the  
24 money then either.

25 \$5,000, \$5,000, \$5,000, \$5,000. We're still in

1 January. But it's not about the money?

2 January 29th, one month in, a \$15,000 check to  
3 Joe DeLeon. Guess that wasn't about the money. \$5,000,  
4 \$5,000, \$5,000, the Ford F-150. February 17th, we're only into  
5 February, not even two months in, but this probation is not  
6 about the money, ladies and gentlemen.

7 A Lexus, on February 22nd. \$5,000, \$250,000.  
8 But it wasn't about the money. A \$15,000, \$5,000, \$5,000,  
9 \$5,000, \$9,000, \$76,000 for a Mercedes. But we're supposed to  
10 believe none of this was about the money.

11 \$5,000, a Toyota Tacoma, \$154,000 for a house,  
12 and \$70,000 to remodel it. But none of this was about the  
13 money.

14 Over \$700,000 in a year. It's dizzying to read.  
15 Think about how dizzying for Casi. Her money, her freedom.  
16 Those were the choices she was left with. Of course for Casi  
17 it is an easy choice, right? Her freedom.

18 But did she really even have a choice? Being  
19 under constant stress, manipulation, control; exploitation;  
20 surveillance; lies from the moment she woke up in the morning  
21 until the moment she went to bed at night. Wait a second, even  
22 her sleep can't be peaceful. Remember she gets roused as  
23 2:00 a.m. with another crisis. You've got to clean your house,  
24 Casi, because CPS is coming first thing in the morning.

25 But it's not about the money? Go back and look

1 at Exhibit 37. Those are the text messages between Bill Stone  
2 and DeLeon. The text messages they didn't delete.  
3 October 30th, 2015. One week before Casi's grandma dies. Are  
4 those two talking about Casi spiraling out of control, concerns  
5 about her sobriety? No. DeLeon to Stone: FYI, this is Casi  
6 Thompson's family business, with the family name. But it's not  
7 about the money?

8 She had a 4.0 that semester. She was going to  
9 school. She was taking night classes. She was taking her kid  
10 to her friend Daralyn's. There was no spiral. There was no  
11 need for this probation. Except for the money.

12 So we're supposed to believe Bill lies about  
13 everything that we've heard for weeks now, except the money and  
14 his intent about it. So in the fog of all these lies they --  
15 there is just this one sliver of truth, the one sliver of truth  
16 that makes all of this a crime.

17 I want to address a few things that were brought  
18 up in closing. We've shown you what all those \$5,000 were for.  
19 It was the travel lie. You've got the documentation every  
20 single time. That restitution, the Green Dot Mastercard with  
21 Enterprise. You heard multiple phone calls. Yeah, that did  
22 exist.

23 Here's the thing. If he had to lie to her about  
24 any one of these things, that blows this whole defense of  
25 consent, "it was a gift," out of the water. Why would he have

1 to lie about anything? Because he had to lie about everything.

2           Casi told Ranger Briley the first time she met  
3 him, and she told you on the stand, I believed he was an FBI  
4 agent when this fraud started. At some point well into the  
5 probation he retired and became CIA. So that's the end of that  
6 matter.

7           Addressing their relationship. It's a real  
8 inconvenient truth for the defense that all the money goes out  
9 in that first year. Look at the calendars. I submit to you  
10 that's Bill Stone actually telling the truth. Because those  
11 are just for him. That's for him to keep track of his lies.

12           That 2015 calendar, you see Casi in there twice  
13 going to dinner. But we're not even sure if it is Casi because  
14 the name is not even spelled right. Casi told you they had sex  
15 for the first time in 2016. You see in it the calendar. Go  
16 look. Summer of 2016. And if you look at these calendars you  
17 are going to know, if he's having sex with her, it's in there.  
18 She even told you that is not even when a relationship started.  
19 And gosh knows that would be really expensive sex if it was.  
20 She told you not until end of 2017 when I graduated college did  
21 a relationship start then. Inconvenient for them, no money is  
22 going out at that point.

23           Defense counsel asked you, why did the money  
24 stop? The money stopped because they bled her dry in the first  
25 year. Remember, Casi, what she got that first year was a

1 million-dollar life insurance policy. And in a year, they got  
2 over \$700,000 of that money. He had a house. He had two cars.  
3 He had lots of cash. He had to pace himself.

4           Also ask yourself this. If this house that was  
5 bought together in 2016 was bought for them to live in, and was  
6 bought as a thing for them to be together, why did Casi never  
7 live there? There's been no evidence to the contrary. We're  
8 up to 2019. Casi has never lived in that house that apparently  
9 they bought together.

10           To answer another question, what was the scheme  
11 between the two? The scheme was that they would financially  
12 benefit from Casi Thompson being on a probation. Joe DeLeon  
13 knew that that was unlawful for him to do so. And that's why  
14 four separate times, go look: September 5th, two times with  
15 Ranger Briley, September 17th with Ranger Briley, May 7th with  
16 Brian Luley, each time Joe DeLeon says, oh, I bought that truck  
17 from her. Which he knows is a lie, but he knows he needs to  
18 say that because he knows it is unlawful for him to financially  
19 benefit from someone that's on probation, real or not.

20           Ask yourself this. Fast-forward to June 2019  
21 when things really start to unravel. And they unravel because  
22 Casi is starting to ask questions and realize the truth. She  
23 is coming out of the fog of lies. Why doesn't Bill Stone at  
24 that point just say, I'm sorry, I've been lying to you all  
25 these years? Bill Stone, FBI agent, of all people knows lies



1 aren't a crime. It's just lies. So why doesn't he just say to  
2 her at that point, I'm a terrible person, but I've lied to you?

3 He doesn't, because he knows it's not just lies.  
4 He knows he's committed a crime and he needs her to believe so  
5 that she doesn't talk. So that his crime can stay covered up.  
6 That's why he surveils her. That's why he destroys hard  
7 drives. That's why he deletes texts. And don't you find it  
8 funny he deletes, God knows, thousands upon thousands of text  
9 messages, but the few that remain are about their pregnancy?

10 Don't think for one second that already in the  
11 summer of 2019, FBI Agent Bill Stone isn't figuring out what  
12 his defense is to all of this. He's working multiple fronts.  
13 Destroy, create a story line, but keep lying to Casi. Because  
14 maybe if she keeps thinking it's real, she'll just drop it and  
15 move on.

16 You know who else continues to lie is  
17 Joe DeLeon. So setting this up, if you look at the calendar on  
18 August 2nd, 2019, Bill Stone writes: Casi recording me. He  
19 knows from that point on. DeLeon and Bill Stone talk for an  
20 average of 30 minutes a day in August 2019. Yet when DeLeon  
21 gets on a recorded call with Casi on September 3rd, he tells  
22 her, oh, I haven't talked to Bill in a long time. Why?  
23 They're scheming. They have a plan.

24 On that September 3rd call, Casi never once  
25 mentions money. Never says a \$600,000 amount. Yet two days

1 later, when DeLeon goes and interviews with Ranger Briley, he  
2 says, oh, she told me it was something like 600,000. He didn't  
3 get that number from Casi. He didn't get that number from  
4 Ranger Briley. He got that number from Bill Stone.

5 So then you have to ask yourself, why doesn't  
6 DeLeon sit in that interview and tell Ranger Briley, yeah, Bill  
7 Stone told me that she's accused me -- that he has -- that Casi  
8 has accused him of \$600,000? Why doesn't he tell Ranger Briley  
9 that? He doesn't. He and Bill Stone are working out their  
10 lies together. They are doubling down on this probation story.  
11 Maybe it'll make Casi back away. Maybe it'll make  
12 Ranger Briley go away.

13 Yeah, I don't know, maybe there is such a thing  
14 as federal probation. I'm a Texas Ranger. That's a -- I do  
15 state crimes. Maybe I'll just back off.

16 They are working out a scheme and a plan. They  
17 are continuing to lie. Not for the sake of the lie, not for  
18 the sake of keeping this probation going. For what reason?  
19 They're continuing to lie to cover up their crimes.

20 Remember Stone's attorney telling you to imagine  
21 this story that Casi told you, just now in his closing? And  
22 imagine is a great word, because it was an imaginary story. It  
23 was nothing but the attorney's words. It was not based on  
24 facts, and it was not based on the evidence that you got in  
25 this courtroom.

1                   Casi didn't tell you that story because it isn't  
2 the truth. But you know what is the truth? Casi told you  
3 things. And then we brought you Bill Stone's own words from  
4 his calendars. And it corroborated. It backed up the dates.  
5 It backed up the story line that she gave you.

6                   And Casi, how easy would it have been for Casi  
7 to come in here, and when that \$9,000 was brought up, she could  
8 say, oh, yeah, that money, too. But, no, Casi is telling you  
9 the truth. So she says I'm not 100 percent sure about it.

10                  Casi is listening to every question and trying  
11 to give you the most thoughtful, honest response. It would  
12 have been so easy for her to just blanket all the money. So  
13 yeah, the Rolex, the bags, everything. No. She said no, no,  
14 that -- I mean, we know it was still based on a lie -- I had to  
15 give him a Rolex because he said he lost his when he had to go  
16 to Austin, and I felt bad. But she told you the painstaking  
17 truth with each and every transaction.

18                  And even with that 9,000, we've brought you  
19 evidence to corroborate that it was part of the travel lie.  
20 The travel lie occurred right on those same dates, and Bill  
21 Stone put in his calendar, Project, dollar sign.

22                  We've heard a lot of words used about this case.  
23 Bizarre, weird, crazy. This is Casi Thompson's life. This was  
24 her life for four years. So anything bizarre and crazy that  
25 you've heard about this story rests completely with these two

1 men. None of that comes back on Casi Thompson.

2 Do not cheapen her victimization because of the  
3 absurdity of their lies. They exploited every vulnerability  
4 she had to their financial gain. It's not bizarre. It's not  
5 crazy. It's not weird. What it is is depraved, diabolical,  
6 and most importantly for you guys, criminal.

7 It was about the money every single time. Every  
8 single day. Project 2 and a dollar sign.

9 We ask you to return a guilty verdict on all  
10 counts, because it is the only verdict that can be reached when  
11 you apply the law to the facts that you've heard in this case  
12 and your common sense.

13 Thank you.

14 THE COURT: All right. Members of the jury, now  
15 you get to discuss the case. I appreciate your time and your  
16 attention to everything. Before you actually begin your  
17 deliberations, I need to give you one final instruction. And  
18 I'll come do that here in just a moment.

19 So if you would recess back and hold off on  
20 discussing anything for just a moment, and I'll come and visit  
21 you in just a second.

22 All rise for the jury.

23 (Jurors exit courtroom for deliberations.)

24 (Court adjourned.)

25

1 I, BROOKE N. BARR, United States Court Reporter  
2 for the United States District Court in and for the Northern  
3 District of Texas, Dallas Division, hereby certify that the  
4 above and foregoing contains a true and correct transcription  
5 of all proceedings in the above-styled and -numbered cause.

6  
7 WITNESS MY OFFICIAL HAND this the 31st day of  
8 August, 2023.

9  
10  
11 /S/ BROOKE N. BARR  
12 BROOKE N. BARR, CSR NO. 6521  
13 CSR Expiration Date: 7/31/24  
14 United States Court Reporter  
15 1100 Commerce Street  
16 Room 1376  
17 Dallas, Texas 75252  
18 (214) 753-2661  
19  
20  
21  
22  
23  
24  
25